

# APPENDIX H

## PUBLIC COMMENTS AND RESPONSES

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The following appendix contains copies of public comments received in response to the Tracy to Silver Lake Transmission Line Project DEIS. The agencies' responses to the substantive comments are provided adjacent to the reproduced comment letters. 130 comment letters were received on the DEIS, 70 of those through regular mail. Forty-one of the comment letters were sent by electronic mail and seventeen used a form letter. A total of 585 written comments were received. Copies of the comment letters, responses to comments, and copies of the technical reports are available from the BLM at the address indicated in the abstract.

### Agency Letters

- 1 US Environmental Protection Agency (USEPA)
- 2 US Department of Transportation-Federal Aviation Administration (FAA)
- 3 Airport Authority of Washoe County (AAWC)
- 4 Nevada Division of Water Resources (DWR)
- 5 Truckee Meadows Regional Planning Agency (TMRPA)
- 6 US Dept. of Interior (DOI)-Bureau of Indian Affairs (BIA)
- 7 City of Reno
- 8 US Fish and Wildlife Service (USFWS)
- 9 Tri Basin Cultural Committee
- 10 Reno-Sparks Indian Colony
- 11 Washoe County Commission
- 12 City of Sparks
- 13 Reno-Sparks Indian Colony

### Private Company Letters

- 14 Reno Air Racing Association, Inc.
- 15 Red Rock Estates Property Owners Association
- 16 LIONEL SAWYER & COLLINS-  
ATTORNEYS AT LAW
- 17 Silver Knolls Property Owners Association

- 18 Barker-Coleman Communities
- 19 Citadel Communications Corporation-Reno
- 20 Golden Valley Property Owners Association
- 21 Centex Homes
- 22 Aircraft Funding Group
- 23 Pierre A. Hascheff, Chtd.
- 24 Sierra Pacific Power Company

### Private Citizen Letters

- 25 Lori Burke
- 26 Lori Burke
- 27 Lori Burke
- 28 Lori Burke
- 29 Lori Burke
- 30 Lori Burke
- 31 Lori Burke
- 32 Lori Burke
- 33 Lori Burke
- 34 Lori Burke
- 35 Lori Burke
- 36 Lori Burke
- 37 Lois Avery
- 38 Jacqueline F. Quoetone
- 39 Don Vetter
- 40 Dan and Capa Casale

41 Jerry J. Casale  
42 Dennis V. and Vernie G. McCrohan  
43 James L. Murphy (Lear Family Trust)  
44 James Short  
45 Jane Short  
46 Josephine and Richard Magee  
47 R.C. and Phyllis Barnes  
48 Pan Lambert  
49 Terrylyn Caulk  
50 Vallea Rose  
51 Marian and Donald Pava  
52 Patricia and Thomas John  
53 John K. Bradbury  
54 Robert McKinnon  
55 Will Brown  
56 William R. Jameson  
57 Junel Bacigalupo  
58 Ed and Charlene Murray  
59 Will Peterson  
60 J.M. Bartmess (SS Airport Manager)  
61 Dianne Bartmess  
62 Joseph Da Rousseau  
63 Crill Maples  
64 Howard Lambert  
65 Mark and Susan Boyd  
66 Margaret Jackson  
67 James G. and Jean M. Stewart  
68 Sue Boyd  
69 David Call  
70 Sandra and Ralph Theiss

Emails

71 Gloria Barrere  
72 Mark Anders  
73 Max Bartmess (SS Airport Manager)  
74 Herb and Deborah Brady  
75 Bill and Marilyn Brainard  
76 Carolyn Brundtland  
77 David and Marie Capurro  
78 Steve Cavote  
79 Mike and Bev David  
80 Douglas DeMers  
81 Jim Dick  
82 Joe DiPrinzio  
83 Michael and Linda Duc  
84 Mac Douglass  
85 Ted Emel  
86 Stacie Easterwood  
87 Suzanne S. Emel  
88 Ed and Dee Endemano  
89 Monte Forbes and Maralee Quanbeck  
90 Mr. and Mrs. Clayton R. Girard  
91 Brian Goates  
92 Don V. Gustavson  
93 Marty and Colleen Harsin  
94 Dan Herman

95 John and Elizabeth Howe  
96 Vee Kelley  
97 Pan Lambert  
98 Christy Malone  
99 Ali McDowell  
100 Marilyn Merkle  
101 Penny Northrup  
102 James R. Omori  
103 Jeff and Lynnette Peters  
104 Lynette Peters  
105 Edgar Pew  
106 Joe and Luverne Lightfoot  
107 Guy L. Quiggle  
108 Carl D. Savely  
109 Robert W. Trimmer  
110 Richard Wilder  
111 Mitch Ziegler  
112 Linda Shepard/ Linda Cunrod

Form Letters

113 David Schulte  
114 Carrie Stropp  
115 Unreadable Signature  
116 Robert Doll  
117 Ron Akers  
118 Unreadable Signature  
119 Jeff M.  
120 Terri Hale  
121 Theresa Schulte  
122 Theresa J. Sanchez  
123 Denis Van Gundy  
124 Beverley Van Gundy  
125 Dan Blake  
126 Joanne Blake  
127 Marybeth Akers  
128 James Akers  
129 Tammy Yau  
130 Mike Yau

## Comments

## Responses

Letter  
1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

2003 NOV -7 AM 11:32

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

November 5, 2003

Terri Knutson  
Bureau of Land Management  
Carson City Field Office  
5665 Morgan Mill Road  
Carson City, NV 89701

Subject: Tracy-Silver Lake Transmission Line Project Draft Environmental Impact Statement  
(DEIS), Washoe County Nevada [CEQ # 030455]

Dear Ms. Knutson:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to our authorities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

We have rated this DEIS as EC-2 – Environmental Concerns-Insufficient Information (see enclosed "Summary of Ratings and Follow-Up Actions). Our concerns are based on uncertainties regarding impacts to waters of the U.S., wetland and riparian communities, and air quality. We recommend that additional information regarding these issues be included in the Final Environmental Impact Statement (FEIS). Our detailed comments are enclosed.

We appreciate the opportunity to review this DEIS. Please send a copy of the FEIS to this office at the same time it is officially filed with our Washington, DC, office. If you have any questions, please call me at (415) 972-3854 or Jeanne Geselbracht at (415) 972-3853.

Sincerely,

Lisa B. Hanf, Manager  
Federal Activities Office

MI# 003990  
cc: US Army Corps of Engineers, Reno

Final EIS for the Proposed Tracy to Silver Lake 120 kV Transmission Line  
H-3

Public Comments and Responses

## Comments

Tracy-Silver Lake Transmission Line Draft EIS  
EPA Comments - November, 2003

### Waters of the U.S.

- 1-1** According to the DEIS (p. 3-15), the only perennial stream and jurisdictional water of the U.S. in the project area is the Truckee River; all other streams are ephemeral and drain into isolated valleys. However, no jurisdictional delineation was conducted for this project, so the absence of waters of the U.S. other than the Truckee River is unsupported in the document.

**Recommendation:** BLM should contact the U.S. Army Corps of Engineers to determine whether other jurisdictional waters exist in the project area and whether a jurisdictional delineation is needed. If so, the Final Environmental Impact Statement (FEIS) should discuss the analysis and state whether an individual or nationwide permit will be needed pursuant to Section 404 of the Clean Water Act.

- 1-2** The DEIS (p.4-20) states that there are small wetlands along the route, and there is a potential for riparian communities to be directly or indirectly affected as a result of construction activities.

**Recommendation:** The FEIS should discuss specifically how waters of the U.S. and wetland and riparian communities will be avoided by construction and maintenance activities, including service roads. If wetland/riparian areas, including waters of the U.S., cannot be avoided by all aspects of the project, the FEIS should describe the potential direct and indirect impacts and discuss how these effects will be minimized and mitigated on both public and private lands.

### Air Quality

- 1-3** The DEIS focuses primarily on the construction-phase impacts of the project on air quality in the project area and states on page 4-62 that the project would not result in long-term impacts to air resources. Although it is clear that the proposed project is necessary to provide reliable electrical capacity for the Spanish Springs Valley and Stead areas, the DEIS (p. 4-76) indicates that projected growth in these areas could not occur without the project. The long-term cumulative impacts to air resources of this project along with several others listed in Table 4-31 have not been sufficiently addressed. Long-term impacts include those associated with the regional growth, such as increased emissions associated with increased vehicle miles traveled in the growth areas. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

**Recommendation:** The FEIS should describe and estimate the long-term cumulative impacts to air quality from existing and future foreseeable projects, including the proposed project. The discussion should address the potential cumulative impacts to

## Responses

### 1-1

Reworded section to clarify methods. NWI maps were reviewed and a field survey was conducted. In the environmental consequences section, the mitigation subsection was expanded to clarify that a wetland scientist would walk the route and mark all potential wetlands, waters, and drainages for avoidance. It is anticipated that the nature of the construction and the dryness of the area would make it possible to avoid most of these areas. Added a requirement that the ACOE inspect these marked areas. If any were determined to be jurisdictional, than a Section 404 permit would be secured prior to any construction. Formal wetland delineation is unlikely to be needed for avoidance of non-jurisdictional areas. A formal delineation could be required for any impacts on jurisdictional areas in association with the 404 permit.

### 1-2

As stated in comment above, mitigation section was expanded to explain how avoidance would be accomplished, and how mitigation via a 404 permit would be conducted if any impacts to jurisdictional Waters of the US were unavoidable.

### 1-3

Cumulative air quality effects of development in Washoe County over the last decade have not resulted in worsening air quality conditions as evidenced by air quality monitoring conducted by the Washoe County Air Quality Management District. Washoe County has not monitored a violation of the federal 1-hour ozone standard since 1990 and has not monitored a violation of the federal 8-hour carbon monoxide standard since 1991; the 8-hour standard was not exceeded in the following three years, so the three-year average does not violate the national standard (Washoe County AQMD Air Quality Trends Report for 1991 – 2002). PM<sub>10</sub> levels in Washoe County have remained relatively stable since the early 1990s and show no clear trend. Overall, however, historical air quality data show a trend of slow improvements in air quality, indicating that existing regulatory programs are compensating for the additional air pollutant emissions that accompany ongoing development trends. There are no indications that development accommodated by the proposed project will lead to new violations of federal air quality standards or to air quality changes that would interfere with PSD program requirements for new industrial emission sources. However, the following text has been added to Chapter 4 in the Cumulative Impacts-Air Resources section:



## Comments

Tracy-Silver Lake Transmission Line Draft EIS  
EPA Comments - November, 2003

National Ambient Air Quality Standards (NAAQS) and Prevention of Significant Deterioration (PSD) increments applicable to air quality in the project area.

1-4

The project area is designated as non-attainment for carbon monoxide, PM 10 (particulates smaller than 10 microns), and ozone. The Clean Air Act prohibits federal approval of a project for which conformity with the State Implementation Plan (SIP) cannot be assured. The DEIS does not discuss how the proposed project conforms with the SIP.

**Recommendation:** The FEIS should explain how the proposed project is in conformity with the SIP. You may wish to contact Washoe County District Health Department, Air Quality Management Division for specific information regarding the SIP.

## Responses

### 1-3 cont'd

“Cumulative growth has and will continue to occur in the project area. Historical trends show no decline in air quality conditions during the previous decade of development; rather, a slight improvement has been documented. Therefore, it is assumed that existing regulatory programs and improvements in technology will continue this trend of successfully managing air quality.”

### 1-4

A discussion of Clean Air Act conformity and the relevant de minimis thresholds has been added to the Air Resources sections of Chapters 3 and 4 in the EIS. Given the relatively modest extent of land disturbance required for powerline and substation construction and the phased timing of construction activities, construction activity emissions would be less than the relevant CAA conformity de minimis thresholds regardless of the selected alternative. Activities required for operation of the transmission line would be small in scale and also would be less than relevant CAA conformity de minimis thresholds. Therefore, no Clean Air Act conformity determination is required for the proposed project.

The following subsection has been added to the Air Resources section of Chapter 3:

#### “Regulatory Considerations

Section 176(c) of the Clean Air Act, USC § 7506(c), requires federal agencies to ensure that actions undertaken in nonattainment or maintenance areas are consistent with the Clean Air Act and with federally enforceable air quality management plans (SIPs). EPA has promulgated separate rules that establish conformity analysis procedures for transportation-related actions and for other (general) federal agency actions. The EPA general conformity rule applies to federal actions (including federally funded or approved actions) occurring in nonattainment or maintenance areas when the total direct and indirect emissions of nonattainment pollutants (or their precursors) exceed specified thresholds, or de minimis levels. Because the proposed action or its alternatives would occur in nonattainment areas, the applicable de minimis levels are 100 tons per year of ozone precursor emissions (NO<sub>x</sub> and ROG), 100 tons per year of carbon monoxide, and 70 tons per year of PM<sub>10</sub>. Note

## Comments

### SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

#### ENVIRONMENTAL IMPACT OF THE ACTION

##### "LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

##### "EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

##### "EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

##### "EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

#### ADEQUACY OF THE IMPACT STATEMENT

##### Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

##### "Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

##### "Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

## Responses

### 1-4 cont'd

that only the southern, foothills, and existing corridors alternatives traverse the CO and PM10 nonattainment areas; the remainder of the alternatives, including the proposed action, are subject only to the ozone precursor de minimis levels."

One of the following paragraphs has been added to the Air Resources section of Chapter 4-Environmental Consequences for each alternative, as appropriate by location:

"The applicable CAA conformity de minimis level of 100 tons per year of ozone precursors would not be exceeded, and no CAA conformity determination would be required."

"The applicable CAA conformity de minimis levels of 100 tons per year of ozone precursors, 100 tons per year of carbon monoxide, and 70 tons per year of PM<sub>10</sub> would not be exceeded, and no CAA conformity determination would be required."

## Comments

## Responses

Letter  
2



U.S. Department  
of Transportation  
Federal Aviation  
Administration

Western-Pacific Region  
Flight Standards Division

P.O. Box 92007  
Los Angeles, CA 90009-2007

DEC 4 2003

Krys T. Bart, A.A.E.  
Executive Director  
Airport Authority of Washoe County  
Reno/Tahoe International Airport-  
Reno Stead Airport  
P.O. Box 12490  
Reno, NV 89510

Dear Ms. Bart:

Our analysis of the proposed construction of power lines north of the Reno/Stead Airport shows the power lines are planned almost on top of the present racecourses.

2-1

The construction of this power line would severely impact safety at the Reno National Air Races. In Formula One and Unlimited Classes pilots fly around the pylons as fast as safety permits with altitudes ranging from 5 to 200 feet. These speeds and altitudes leave little room for error in an emergency situation where pilots use extremely fast vertical and lateral maneuvers to remove themselves from the course. These maneuvers would be extremely hazardous with construction of the power line at its proposed site.

The height of the power line and proximity to racecourse would make it impossible to grant a waiver for these races.

Western Region Flight Standards does not concur with the construction of this power line at the proposed site because of this impact.

Sincerely,

Chuck Hicks  
Manager, Technical Standards Branch

Post-it* Fax Note	7671	Date	12/10/03	# of pages	1
To	Tessi Knutson	From	Dean Schultz		
Co./Dept	B2M	Co.	AAWC		
Phone #		Phone #			
Fax #	885-6147	Fax #			

2-1

Comment noted. SPPCo would be required to file a Notice of Proposed Construction to receive a construction permit from the FAA for the final selected route. The construction permit will cover normal operations of both the Reno-Stead and Spanish Springs Airports. SPPCo will consult with the FAA to find a construction design of the transmission line to avoid conflicting with the Reno Air Races. In addition, the Proposed Reno-Stead Airport Substation, the Alternative Reno-Stead Airport Substation, and the distribution lines coming out of the substations will be lower in height than the distribution line that currently exists along the boundary of the airport avoiding any conflict with the Air Races. Other alternatives and mitigation measures as described in the Draft EIS can or may resolve the impacts associated with the two airports.

Letter  
3



Krys T. Bart, A.A.E.  
Executive Director

2003 DEC 12 PM 12:55

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

December 11, 2003

BLM Carson City Field Office  
Attn: Terri Knutson, Planner  
5665 Morgan Hill Road  
Carson City, NV 89701

**Re: Proposed Tracy to Silver Lake 120 kV Power Transmission Line Installation at the  
Reno Stead Airport Draft Environmental Impact Statement**

Dear Ms. Knutson:

As you know, the Reno Stead Airport is the home of the National Championship Reno Air Races which attracts over 150,000 spectators annually and is a tremendous economic contributor to the local community. The Airport Authority of Washoe County (AAWC), owner and operator of the Reno Stead Airport, fully supports the air race operations, and in turn, cannot support any action that may hamper their continued success.

Since the Federal Aviation Administration (FAA) is responsible for determining the impacts to aircraft operations from potential new obstructions, the AAWC requested their input on the above-referenced project as it may affect both our normal daily operations as well as the activities of the Reno Air Race Association (see attached letter dated 10/12/03). Through verbal discussions with the FAA it was determined the proposed power line would not likely interfere or restrict the normal daily operations at the Reno Stead Airport today however, there was concern expressed as to the limitations that it may have on long-term activities as well as to the air races a major community event.

In regard to the Reno Air Race Association activities, the FAA has provided a written indication (see attached letter dated 12/04/03) that they would not grant a waiver for the Formula One and Unlimited class races if the transmission line were installed as proposed. The Unlimited class races are by far the most popular and without them the event as a whole will suffer significantly.

3-1

Airport Authority of Washoe County  
Reno/Tahoe International Airport • Reno Stead Airport  
P.O. Box 12490 • Reno, NV 89510 • 775-328-6400 • Fax 775-328-6414 • kbart@renoairport.com

## Comments

## Responses

3-1

Refer to response 2-1.

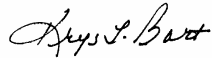
## Comments

3-1  
cont'd

Based on the FAA's conclusion, the AAWC opposes the installation of the power transmission line as proposed. We would however, be happy to assist in facilitating discussions amongst the various stakeholders in an effort to find a compromise solution.

If you have any questions or require further information pertaining to this matter, please do not hesitate to contact Dean Schultz, Manager of Planning and Environmental Services at (775) 328-6469.

Sincerely,



Krys T. Bart, A.A.E.  
Executive Director

Cc: Thomas Gribbin, AAWC Trustee  
Larry Martin, AAWC Trustee  
Marily Mora, AAWC Deputy Executive Director  
Dean Schultz, A.A.E., AAWC Manager of Planning and Environmental Services  
Skip Polak, AAWC Manager of Reno Stead Airport  
Michael Houghton, Reno Air Race Association  
Bill Roullier, Sierra Pacific Power Company

KTB/des

## Responses

## Comments

## Responses



Krys T. Bart, A.A.E.  
Executive Director

October 12, 2003

Mr. Clarence Bohartz  
Reno Flight Standards District Office  
Federal Aviation Administration  
4900 Energy Way  
Reno, NV 89502

**Re: Proposed 120 kv Power Transmission Line Installation at the Reno Stead Airport**

Dear Mr. Bohartz:

As you may know, the Bureau of Land Management (BLM) is preparing an Environmental Impact Statement (EIS) for the installation of a new 120 kv power transmission line proposed by Sierra Pacific Power Company. As shown in the attached drawing, the preferred route for this power line includes a portion that runs along the entire western property line of the Reno Stead Airport with poles that range in height of 50 to 90 feet above ground level.

The Airport Authority is participating in the EIS as a cooperating agency because of the potential impacts this transmission line may have on our property and tenant aircraft operations. Before the Airport Authority makes official comments on the EIS, we would like to solicit the Federal Aviation Administration's input pertaining to the potential impacts this transmission line may have on both our normal daily operations as well as the activities of the Reno Air Race Association.

At your earliest convenience, please provide us in writing the constraints this transmission line, as proposed, would place on activity at the Reno Stead Airport. If you have any questions or require further information pertaining to this matter, please do not hesitate to contact Dean Schultz, Manager of Planning and Environmental Services at (775) 328-6469.

Sincerely,

A handwritten signature in cursive script that reads "m. moran for Krys T. Bart".

Krys T. Bart, A.A.E.  
Executive Director

Cc: Dean Schultz, A.A.E., AAWC Manager of Planning and Environmental Services

KTB/des

Airport Authority of Washoe County  
Reno/Tahoe International Airport • Reno Stead Airport  
P.O. Box 12490 • Reno, NV 89510 • 775-328-6400 • Fax 775-328-6414 • kbart@renoairport.com

## Comments



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Flight Standards Division

P.O. Box 62007  
Los Angeles, CA 90009-2007

DEC 4 2003

Krys T. Bart, A.A.E.  
Executive Director  
Airport Authority of Washoe County  
Reno/Tahoe International Airport-  
Reno Stead Airport  
P.O. Box 12490  
Reno, NV 89510

Dear Ms. Bart:

Our analysis of the proposed construction of power lines north of the Reno/Stead Airport shows the power lines are planned almost on top of the present racecourses.

3-2

The construction of this power line would severely impact safety at the Reno National Air Races. In Formula One and Unlimited Classes pilots fly around the pylons as fast as safety permits with altitudes ranging from 5 to 200 feet. These speeds and altitudes leave little room for error in an emergency situation where pilots use extremely fast vertical and lateral maneuvers to remove themselves from the course. These maneuvers would be extremely hazardous with construction of the power line at its proposed site.

The height of the power line and proximity to racecourse would make it impossible to grant a waiver for these races.

Western Region Flight Standards does not concur with the construction of this power line at the proposed site because of this impact.

Sincerely,

Chuck Hicks  
Manager, Technical Standards Branch

## Responses

3-2

Refer to response 2-1.

Letter  
4

KENNY C. GUINN  
Governor

## Comments

STATE OF NEVADA

JOHN P. COMEAUX  
Director



### DEPARTMENT OF ADMINISTRATION

209 E. Musser Street, Room 200

Carson City, Nevada 89701-4298

Fax (775) 684-0260

(775) 684-0209

2003 DEC -1 PM 2:14

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

November 25, 2003

Terri Knutson, Planner  
Bureau of Land Management  
Carson City Field Office  
5665 Morgan Mill Road  
Carson City, NV 89701

Re: SAI NV # E2004-061  
Project: Draft EIS – Tracy to Silver Lake Transmission Line Project

Dear Ms. Knutson:

Enclosed are the comments from the Nevada Division of Water Resources concerning the above-referenced document. These comments constitute the State Clearinghouse review of this proposal as per Executive Order 12372. Please address these comments or concerns in your final decision. If you have questions, please contact me at (775) 684-0227.

Sincerely,

A handwritten signature in cursive script, reading "Julie A. Butler".

Julie A. Butler  
Acting Nevada State Clearinghouse Coordinator/SPOC

Enclosure

## Responses



## Comments

### NEVADA STATE CLEARINGHOUSE

Department of Administration  
Budget and Planning Division  
209 East Musser Street, Room 200  
Carson City, Nevada 89701-4298  
(775) 684-0227  
Fax (775) 684-0260

DATE: October 6, 2003

Governor's Office	Legislative Counsel Bureau	Conservation & Natural Resources -
Agency for Nuclear Projects	PUC	Director's Office
Energy Office	Transportation (General)	State Lands
Agriculture Department	Transportation (Airspace)	Environmental Protection
Minerals Commission	Office of Traffic Safety	Forestry
UNR Bureau of Mines	UNR Library	Conservation Districts
Economic Development	UNLV Library	State Parks
Tourism	Historic Preservation	Water Resources
Fire Marshal	Emergency Management	Natural Heritage Program
Human Resources	Office of the Attorney General	Wild Horse Commission
Health Division	Washington Office	Wildlife Department - Director's Office
Indian Commission	Nevada Assoc. of Counties	Region 1 - Fallon
Colorado River Commission	Nevada League of Cities	Region 2 - Elko
Animal Damage Control		Region 3 - Las Vegas

Nevada SAI # E2004-061  
Project: Draft EIS - Tracy to Silver Lake Transmission Line Project (see also E2002-191)

Send more information on this project as it becomes available.

#### LEARNINGHOUSE NOTES

Enclosed, for your review and comment, is a copy of the above mentioned project. Please evaluate it with respect to its effect on your plans and programs; the importance of its contribution to state and/or local areawide goals and objectives; and its accord with any applicable laws, orders or regulations with which you are familiar.

Please submit your comments no later than **November 25, 2003**. Use the space below for short comments. If significant comments are provided, please use agency letterhead and include the Nevada SAI number and comment due date for our reference. Questions? Julie Butler, Acting Clearinghouse Coordinator, (775) 684-0227 or [jbutler@budget.state.nv.us](mailto:jbutler@budget.state.nv.us).

#### THIS SECTION TO BE COMPLETED BY REVIEW AGENCY:

- |  |  |
|--|--|
| <input type="checkbox"/> No comment on this project    | <input type="checkbox"/> Conference desired (See below)  |
| <input type="checkbox"/> Proposal supported as written | <input type="checkbox"/> Conditional support (See below) |
| <input type="checkbox"/> Additional information below  | <input type="checkbox"/> Disapproval (Explain below)     |

#### AGENCY COMMENTS:

**RECEIVED**

NOV 11 2003

DEPARTMENT OF ADMINISTRATION  
OFFICE OF THE DIRECTOR  
BUDGET AND PLANNING DIVISION

4-1

Any use of ground water or surface water other than domestic use as defined by Nevada Revised Statute (NRS) § 534.013 and Nevada Administrative code (NAC) § 534.315 will require the appropriate permits pursuant to NRS 533 and 534 inclusive.

Signature:   
Name: Tim Hunt  
File: 20040106clear.doc

WATER RESOURCES

10-21-03

Agency

Date

4-1

Construction and operation of the project would not require the development of new water resources. Construction water will be obtained from commercial sources. This information has been added to the Proposed Action in Chapter 2.

## Comments

## Responses

Letter  
5



### TRUCKEE MEADOWS REGIONAL PLANNING AGENCY

December 15, 2003

Terri Knutson  
Bureau of Land Management  
Carson City Field Office  
5665 Morgan Mill Road  
Carson City, NV 89701

Subject: Comments on *Draft Tracy-Silver Lake Transmission Line Project EIS*

Dear Ms. Knutson:

The staff of the Truckee Meadows Regional Planning Agency (TMRPA) has reviewed the September 2003 *Draft Tracy-Silver Lake Transmission Line Project EIS*. This letter provides our comments on the adequacy and accuracy of the document.

We have received a copy of the comment letter from the U.S. Environmental Protection Agency dated November 5, 2003. We agree with the comments in that letter pertaining to air quality, and offer the following additional comments on the draft EIS:

#### Aesthetic Impacts

5-1

The DEIS does not fully disclose the aesthetic affects of the proposed action, or describe measures to mitigate those impacts. The discussion of the impact of the proposed action on aesthetic resources is summarized on page 4-42. As part of both the proposed action and alternatives, SPPCo will replace existing distribution line segments with the proposed transmission line segments, which will involve taller poles and more transmission lines. It is stated that since these new poles would be "aesthetically and structurally similar" to the existing poles, this change will constitute a minor impact. This statement seems to discount the visual intrusion resulting from the taller poles and additional transmission lines. This increased visual intrusion is evident in several of the Key Observation Point plates, such as Figures F-8 and F-11.

5-2

In addition, it is stated that, "For developed areas, the poles, lines, access roads, and substations would be similar to other cultural modifications, such as telephone poles and buildings. This would enable the Proposed Action's components to blend in with its surroundings, resulting in long-term minor impacts."

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775-321-8385; Fax 775-321-8386  
<http://www.tmrpa.org>

5-1

The impact to visual resources on BLM land was identified using the visual contrast rating system. This analysis found that the change in form, line, color, and texture of the land/water, vegetation, and structures would be minor. The impacts to non-BLM land were analyzed based on local area plans and their measures for protecting visual resources.

5-2

Refer to response 5-1.

## Comments

## Responses

Ms. Terri Knutson  
December 15, 2003  
Page 2 of 3

5-2  
cont'd | The comparison of transmission line poles with telephone poles and of electrical substations with other buildings in the vicinity again discounts the visual impacts of these facilities. Transmission lines are taller and have more lines than a typical telephone pole. This is evident in several of the Key Observation Point plates.

5-3 | While there are no simulated views of the proposed electrical substations, the nature of this type of facility, with above-ground machinery and electrical equipment, does not generally allow it to blend-in with most existing structures, especially in residential areas.

### Use of Existing Utility Corridors

5-4 | We note from the summary that the impacts of using the existing corridor are the same as, or less than, the impacts of the proposed action. Further, the *Regional Utility Corridor Report* (Regional Utility Corridor Citizens' Advisory Committee, 1999) emphasizes the use of existing utility corridors over the establishment of new corridors.

### Authorizing Actions

To be consistent with State law, the regulations of the Regional Planning Governing Board, and current practice, we would suggest the following modifications to these paragraphs from page 1-5 of the DEIS (suggested deletions shown with strike-through, suggested additions shown in bold italic):

5-5 | SPPCo also would be required to submit applications for a special use permit (SUP) to Sparks, Reno, and Washoe County. As part of the SUP process, each of the jurisdictions would determine if the Proposed Action is consistent with the plans and policies of the jurisdiction and whether any additional controls or modifications to the project are required. The SUP would be reviewed by each jurisdiction's planning authority and would be submitted to the planning commission for approval. ~~In addition, because the Proposed Action is considered to be of regional significance, the SUP would also be submitted to the Reno and Sparks city councils and to the Board of Washoe County Commissioners for final approval.~~ As a project of regional significance, the proposal would *also* be submitted to the ~~FMRA~~ **Regional Planning Commission** by Reno, Sparks, and/or Washoe County before receiving final approval from those entities. Should the final alignment cross the Reno-Stead Airport, the Airport Authority of Washoe County also would be required to grant approval for use of its property.

5-6 | Because the Proposed Action is subject to the approvals of several jurisdictions, the EIS process, including the cooperating agency roles played by the affected jurisdictions, would facilitate the definition of a transmission alignment that is acceptable to all jurisdictions. Through the draft EIS and the subsequent public

5-3

A photograph of a typical substation has been added to the text to provide context to the reader.

5-4

Comment noted. Refer to Chapter 1 under the "Truckee Meadows Regional Plan & Regional Utility Corridor Report" section.

5-5

Text Revised.

5-6

Text Revised.

## Comments

## Responses

Ms. Terri Knutson  
December 15, 2003  
Page 3 of 3

5-7

input, the affected jurisdictions are expected to forge a consensus on a preferred alignment; consequently, the SUP process would not begin until some time after public comment on the draft EIS. The Regional Planning Commission should ~~complete the SUP process, including~~ *make* a finding of conformance for a project of regional significance; before BLM issues a record of decision, so that BLM's decision reflects consensus among all affected jurisdictions.

### Additional Comment

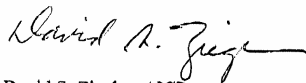
5-8

On page S-2, the first paragraph under Project Alternatives refers to six alternatives to the proposed action. The second paragraph on page 2-1 refers to five alternatives.

### Concluding Remarks

We appreciate the opportunity to provide comments on this draft EIS. If you have any questions, please contact Randy Baxley or me at (775) 321-8385.

Yours truly,



David S. Ziegler, AICP  
Director of Regional Planning

/dz

cc: Bonnie Weber, Chair, Regional Planning Governing Board  
Terry K. Herman, Chair, Regional Planning Commission  
John Hester, City of Reno Community Development  
Adrian Freund, Washoe County Community Development  
Margaret Powell, City of Sparks Community Development  
Andy Goodrich, Washoe County District Health Dept.  
Jack Lorbeer, Regional Transportation Commission

5-7

Text Revised.

5-8

Text Revised- *Six* alternatives to the Proposed Action are evaluated, including the No Action Alternative.

## Comments

Letter  
6



IN REPLY REFER TO:  
Real Property Management  
(775) 887-3570  
Tracy to Silver Lake Transmission Line Project - Draft EIS

### United States Department of the Interior

BUREAU OF INDIAN AFFAIRS  
WESTERN NEVADA AGENCY  
1677 HOT SPRINGS ROAD  
CARSON CITY, NEVADA 89706

2003 OCT 17 AM 11:39

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OCT 15 2003

Ms. Terri Knutson  
EIS Project Manager  
Carson City Field Office  
5665 Morgan Mill Road  
Carson City, Nevada 89701

Dear Ms. Knutson:

I'm writing to provide comments on the draft environmental impact statement written for the Tracy to Silver Lake Transmission Line project. The Bureau certainly recognizes the need for upgraded and expanded electrical transmission capacity.

There is one general and several specific comments that I need make to ensure that the project proponent is able to stay on track with any project implementation that is approved. If either the proposed action or the Calle de la Plata alternative is chosen, the proposed power line will cross Indian owned land. In this case, the Reno-Sparks Indian Colony (Colony) owns the land. Because the Bureau of Indian Affairs (BIA) is the entity responsible for issuing any easement for right-of-way for power lines across Indian land, all federal regulations must be followed. This would include NEPA documentation that would cover Colony land.

This EIS mentions the Colony in some contexts and states that surveys were done on some private lands. However, it wasn't clear whether any surveys were done on Colony land. While this doesn't need to be stated in the EIS, the project applicant should be aware that this EIS may not cover Colony land. Another document might be needed that would tie to this EIS if one of the two alternatives involving Indian land is chosen. Before any easement is issued to cross Indian land, NEPA documentation must be in place. If this EIS was deemed sufficient or if another document is needed, the BIA would need to issue or sign a BIA- specific decision document since we would be issuing an easement document too.

#### Page 1-6. Table 1-1 Potential Regulatory Responsibilities

The BIA should be listed as a potential regulatory agency. If either the proposed action or the Calle de la Plata alternative is chosen, the BIA is the agency responsible for issuing the easement for right-of-way across Reno-Sparks Indian Colony land.

#### Page 2-7. Right-of-Way Preparation

A study corridor of either 300 feet or 600 feet was identified for this project. The EIS was very clear that the study corridor wasn't necessarily synonymous with a future right-of-way. However, the proponent should be aware that for any power line crossing Indian land, the easement cannot be issued for more than 200 feet on each side of the centerline. This is based on federal regulation found in 25 CFR 169.27(d). Any staging areas, maintenance roads and structures would have to be contained within this area, or another easement or other type of documentation would have to be done.

## Responses

### 6-1

Neither the Proposed Action nor any of the alternatives would cross Indian land (including staging areas, maintenance roads and structures. An easement will not be required from the BIA and supplemental NEPA documentation is not necessary. Biological and cultural surveys were performed adjacent to the RSIC within a 600-foot study area.

### 6-2

Refer to response 6-1.

### 6-3

Text added to the Proposed Action to clarify that the routes would not be on Colony lands.

## Comments

- Page 3-29. Aesthetic Resources and Noise**  
 6-4 The Reno Sparks Indian Colony Master Plan established a "sphere of influence" that addressed limiting development even in open-spaces. Power lines are considered to be a development as per the Plan and EIS. By addressing open-spaces specifically, the Colony was addressing aesthetic resources needs associated with the unspoiled visual effects of the open spaces.
- 6-5 Because the Colony Master Plan was mentioned at the onset of the EIS discussion, it probably should be mentioned in this section also.
- Page 3-30. Proposed Action**  
 6-6 Neither the Colony Master Plan nor a discussion of the aesthetic effects was carried through in this section. This could be because the EIS was never intended to cover Indian land. However, the subject of the Colony's Master Plan was broached on page 1-9. The EIS stated on page 1-9 that a power line through Colony land was inconsistent with the Colony Master Plan.
- Page 3-30. Calle de la Plata Alternative**  
 6-7 This alternative has the same concerns as just mentioned for the proposed action. The discussion is shown directive above.
- Page 4-69. Socio-economics and Environmental Justice - Summary**  
 6-8 The second to last line in the paragraph states, "the power line would be partially within the SOI of the Reno Sparks Indian Colony, and concerns from Colony members may arise during the project".  
 Concerns may arise from individual members. However, the EIS had already stated on page 1-9 that the Reno Sparks Indian Colony Master Plan established a "sphere of influence" that addressed limiting development - even in open-spaces. Power lines are considered to be a development as per the Plan and EIS and as such, a power line through Colony land would be inconsistent with the Master Plan. Concerns have already arisen from this documented inconsistency. This should be re-stated in this section.
- Page 4-69. Socioeconomics and Environmental Justice Table 4-28.**  
 6-9 When the EIS already stated that the power line was inconsistent with the Colony Master Plan for development of open-spaces, the Proposed Action and Calle de la Plata alternatives should not be rated at just minor or negligible ratings on all of the impact issues. A moderate or even high category might be warranted.
- Page 4-70. Property Values**  
 6-10 Property values for Reno-Sparks Indian Colony may be different from other land in that it will be Indian-owned for the foreseeable future. For this reason, the aesthetic values of the Indian people that own the land increase in importance as financial compensation decreases in importance - especially for future generations that would have no financial benefit but would have to live with the power line. Some discussion may be warranted and might justify a different rating on the impact issues table.
- Page 4-71. Property Values cont.**  
 6-11 Paragraph 3 mentions the possibility of mitigation for property value decreases via putting the power line underground in residential areas, but not in open areas. Under grounding any power line crossing Colony land should be considered as potential mitigation even in open areas since the line is inconsistent with an established master- planning document.

## Responses

- 6-4  
 The following text was added in chapter 4 under the "Land Use" section to address the comment:  
 "The Proposed Action would be located within the Reno-Sparks Indian Colony's sphere of influence defined in the Year 2000 Comprehensive Plan and Parcel Master Plans (Nevada-Sierra Planners 2000). As such, the Proposed Action would be inconsistent with the comprehensive plan. Where the transmission line is not placed underground in locations covered by the North Valleys, Spanish Springs, Sun Valley, and Truckee Canyon Area Plans, the Proposed Action would be inconsistent with the Washoe County Comprehensive Plan (Washoe County 2003d). The Proposed Action would be in compliance with all other local comprehensive and master plans; however, it would be considered to be a project of regional significance and would require a finding of conformance with the regional plan by the RPC."
- 6-5  
 Refer to response 6-4.
- 6-6  
 Refer to response 6-1.
- 6-7  
 Refer to responses 6-4 to 6-6.
- 6-8  
 The following language has been added to the document following referenced sentence in the comment: "The proposed Action would be inconsistent with the Colony's Master Plan for development in open spaced areas."
- 6-9  
 The inconsistent determination with the County Master Plan is a land use policy determination. Therefore, it is not addressed as a socioeconomic issue. However, text has been added to the Chapter 4 land use section, acknowledging that the Proposed Action and the Calle de La Plata alternatives are inconsistent with the Colony's Master Plan.

## Comments

### Page 4-71. Environmental Justice

6-12

The EIS has established that any power line that crossed Colony land would be inconsistent with the established Colony Master Plan. In this section, it is stated that no mitigation would be necessary. It seems that environmental justice effects do occur because of the inconsistency of the Colony Master Plan and two potential routes - without mitigation even being a consideration.

### Page 4-74. Calle de la Plata Alternative

6-13

The same concerns related to property values and environmental justice would exist for this alternative as was listed for the proposed action on page 4-70 and page 4-71.

### Page 4-84. Table 4-31. Reasonably Foreseeable Future Actions

The table indicates that whatever route the Tracy to Silver Lake power line might take, it "would" (not might) lead to the designation of a regional utility corridor. If either the proposed action or Calle de la Plata alternatives were chosen, this would set the corridor location and be the forerunner of a potentially unlimited number of utility projects in this corridor.

Both the designation of a utility corridor and the future projects it would bring could be potentially inconsistent with the Colony Master Plan. There is potential for a significant cumulative impact to the aesthetics and property values associated with Reno Sparks Indian Colony since two alternatives of the Tracy to Silver Lake project alone were found to be inconsistent with the Colony Master Plan.

6-14

There is also potential for a significant environmental justice cumulative impact from the corridor and future projects in that corridor because these would allow inconsistencies with an established Master Plan, possibly without mitigation. It appears that provisions in all other planning documents that affect this project were either met or mitigated.

I believe some further discussion in this area needs to be included. If this EIS is not used as the NEPA document for any ROW crossing Indian land, there still needs to be some disclosure of these potential impacts. If another NEPA document is needed for a ROW across Indian land, it will need to contain a detailed disclosure of these impacts.

Thank you for the opportunity to review and comment on this EIS. If there are questions concerning these comments, please contact me at the number provided.

Sincerely,



Superintendent

## Responses

6-10

The impact to visual resources was done using the BLM visual contrast rating system. This approach was used to ensure consistency in determinations across different landscapes.

6-11

Refer to response 6-1.

6-12

Refer to response 6-10. While the colony sphere of influence would realize visual impacts from the project, it is not in a disproportional amount.

6-13

Refer to responses 6-10 and 6-11.

6-14

Text in table 4-31 has been revised to read: "The Tracy to Silver Lake Transmission Line Route **could** become a designated regional utility corridor, and other utilities or expanded electrical service **could** be encouraged". Inconsistency with master plan does not equal impacts to property values and environmental justice issues.

## Comments

## Responses

Letter  
7

November 25, 2003

Ms. Terri Knutson  
EIS Project Manager  
Carson City Field Office  
5865 Morgan Mill Road  
Carson City, NV 89701

Subject: Draft Environmental Impact Statement: Tracy to Silver Lake  
Transmission Line Project

Dear Ms. Knutson:

The City of Reno has conducted a preliminary review of the above-referenced reports for a proposed high voltage electrical transmission facility using an alignment that traverses property within the corporate limits of the City of Reno, and offers the following outline of procedures and preliminary comments.

7-1

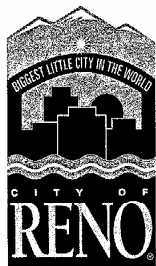
NRS 278.026 defines a Project of Regional Significance for public utilities.<sup>1</sup> Projects of Regional Significance, such as one proposed, have a process outlined in State law and in the Reno Municipal Code, Section 18.06.1106 (Attachments 1 and 2). In addition, the construction of a major utility is subject to Special Use Permit review and approval, plus a series of conditions as outlined in the Reno Municipal Code (RMC 18.06.304.14) (Attachment 3). The regular Special Use Permit findings must be made, as outlined in Section 18.06.1110.C (Attachment 4). Finally, each plant, substation, booster station, and backup generator will need to be constructed addressing the conditions enumerated in RMC 18.06.302 (Attachment 5).

### Preliminary Evaluation of Alternatives:

7-2

The "Purpose and Need" section of the document did not have full justification of the need for the proposed routing, at this time. The City has not been provided with information in the Executive Summary which would justify the need for the proposed

<sup>1</sup> 6. "Project of regional significance," with respect to a project 1 proposed by a utility, includes: 2  
(a) An electric substation; 3  
(b) A transmission line that carries 60 kilovolts or more; 4  
(c) A facility that generates electricity greater than 5 megawatts; 5  
(d) Natural gas storage and peak shaving facilities; and 6  
(e) Gas regulator stations and mains that operate over 100 7 pounds per square inch.



Gloria Dondero Pedro, Senior Planner  
Community Development Department  
P. O. Box 1900  
Reno, NV 89505  
(775) 321-8309

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7-1

Comment noted-Text added to Chapter 1.

7-2

The Purpose and Need for the proposed action is discussed in Chapter 1. The Purpose and Need has been revised to read, "The Airport identifies this growth in their Master Plan and the area is zoned as such." See Chapter 1, "Project History" as to why the Reno Stead Airport substation is included.



## Comments

Ms. Terri Knutson  
Draft Environmental Impact Statement:  
Tracy to Silver Lake Transmission Line Project  
Page 2

7-2  
cont'd routing. We will be requesting documentation from the utility outlining the electricity demands that precipitate this proposal, and the expected population to be served by this major utility.

7-3 If this facility must be constructed, the Calle De La Plata Route would tentatively seem to be the preferred alternative from the City of Reno's standpoint. Not only does the route present the least potential impact to residences, it will result in the least visual interruption of the Pyramid Highway, a roadway to one of the community's most prominent recreational areas: Pyramid Lake. Although more acres will undergo short-term disturbance with the Calle de la Plata alternative than with the Proposed Action, there are no identified habitats of endangered species on the Calle de la Plata route. The effect on mule deer winter habitat is asserted to be negligible, apparently not requiring mitigation. More long-term land disturbance results, but the long-term disturbance travels through a series of large to very large, largely undeveloped tracts of land. A variance with findings made subject to: RMC 18.06.1112 (Attachment 6) will in the alternative circumstance be required because the route does not completely fall within the existing Utility Corridors as outlined in the Regional Utility Corridor Report.

7-4

Thank you for the opportunity to comment on this proposal. Vern Kloos, Senior Planner, will attend the December 5 meeting at the City of Sparks in my place. Vern Kloos can be reached at (775) 334-2272. My phone number is (775) 334-2486.

Sincerely,



Gloria Dondero Pedro  
Senior Planner

Letter - Impact Statement - Tracy to Silver Lake

xc: Fred Turnier, AICP, Planning Manager

## Responses

7-3  
Comment noted.

7-4  
Chapter 4-Land Use acknowledges the project may be of regional significance and would require a finding of conformance with the regional plan. Text has been added stating that a variance [RMC 18.06.1112] would be required because the route does not completely fall within an existing utility corridor as outlined in the RUCR.

NOTE-- Attachments 1-6 are available in the Tracy to Silver Lake EIS Administrative Record at the BLM CCFO office.

## Comments

## Responses

Letter  
8



*MR. J.  
Tenn. ME*

UNITED STATES DEPARTMENT of the INTERIOR

FISH AND WILDLIFE SERVICE  
Nevada Fish and Wildlife Office  
1340 Financial Boulevard, Suite 234  
Reno, Nevada 89502-7147  
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November 19, 2003  
File No. BLM 5-5

### Memorandum

To: Field Manager, Bureau of Land Management, Carson City, Nevada  
From: Field Supervisor, Nevada Fish and Wildlife Office, Reno, Nevada  
Subject: Comments on the Draft Environmental Impact Statement for the Tracy-Silver Lake Transmission Line Project

We have reviewed the above subject document and have the following comments.

8-1

It is stated on page 2-5, Proposed Route section, that the transmission line would begin at the Tracy Power plant and cross the Truckee River. In the Mitigation and Monitoring Measures section, page 4-31, there is no discussion regarding the installation of bird flight diverters on the line crossing the Truckee River. We recommend the installation of flight diverters on the line to prevent bird collisions along this migratory route.

8-2

On page 4-35, Mitigation and Monitoring Measures section, second paragraph, measures to mitigate for possible predation of sage grouse by raptors and ravens include the installation of perch deterrents on "...all transmission towers within the Pah Rah sage grouse range...". We support installation of perch deterrents on the transmission towers as this should also reduce predator nesting activity on these structures. However, installing perch deterrents only on transmission towers fails to prevent perching on the numerous wooden poles that will occur through this area. We recommend that perch deterrents be installed on all towers and all poles through the Pah Rah sage grouse range to more adequately mitigate for future needs of sage grouse.

8-3

On page 4-35, Mitigation and Monitoring Measures section, first paragraph, it is stated that if pygmy rabbits are found during surveying along the selected route, the Bureau of Land Management would initiate section 7 consultation. Since the pygmy rabbit is not a federally listed species under the Endangered Species Act of 1973, as amended (Act), section 7

8-1

Flight diverters have been added as a mitigation measure to Chapter 4.

8-2

The proposed action and alternatives do not propose any additional towers other than the poles as proposed in Chapter 2. Perch deterrents would be placed on all poles within the Pah Rah Range as part of this Transmission Line Project in accordance with the BLM guidelines.

8-3

Text has been revised to say "The Bureau of Land Management would contact the USFWS to discuss avoiding or minimizing direct and indirect impacts to this species."

## Comments

## Responses


Field Manager

File No. BLM 5-5

8-3  
cont'd

consultation would not be required. We are, however, concerned about the status of the pygmy rabbit in Nevada. We have also recently been petitioned to list this species as threatened or endangered across its range under the Act. Because of these issues, we request that if pygmy rabbits or their sign are found along the selected route that your agency contact us for further discussions about avoiding or minimizing direct and indirect impacts to this species as a result of the project.

We appreciate the opportunity to comment on the proposed project. If you have any questions, please contact me or Marcy Haworth at (775) 861-6300.



Robert D. Williams  
Field Supervisor

## Comments

## Responses

### Letter 9

December 15, 2003

Terri Knutson, Project Manager  
5665 Morgan Mill Road  
Carson City, NV 89701

Dear Terri:

We would like to take this time to comment on the proposed Tracy-Silver Lake Transmission Line Project. The Tri Basin Cultural Committee serves as cultural liaisons for the Reno-Sparks Indian Colony (RSIC). One of our commitments is to protect historic artifacts and sacred sites, as well as the indigenous animals, vegetation and wildlife habitats.

9-1

The Tri Basin Cultural Committee would like to respectfully remind the BLM and Sierra Pacific Power Company (SPPC) the provisions of the National Historic Preservation Act, the American Indian Religious Freedom Act and the Native American Graves Protection and Repatriation Act. Upon approval of this proposed project it is mandatory that an archeologist and/or cultural monitor be present at the beginning and duration of this proposed project. In addition, BLM and SPPC must comply with the local and Nevada State laws, as well as remaining confidential when dealing with sensitive, historical and religious items.

9-2

The September 2003 EIS states that Tetra Tech observed one Golden Eagle soaring above the Hungry Valley hills. The Hungry Valley community observes one family of Golden Eagles and possibly more daily. We are requesting that BLM and SPPC provide an in-depth study on Bird Perching Deterrents and Bird Flight diverters. Thank you for your time.

Respectfully Submitted,

Tri Basin Cultural Committee

CC: RSIC Tribal Council  
Russell Brigham, RSIC Environment Program  
Todd Irvine, RSIC Government Relations

9-1

The BLM fully respects the responsibilities under the NHPA, AIRFA, and AGPRA. The BLM and SPPCo will comply with all applicable laws and regulations and handle all information with the utmost confidentiality. The BLM has completed a Class III Cultural Resources inventory in accordance with the NHPA. Additionally the BLM is currently consulting with the RSIC, Pyramid Lake Paiute Tribe, and the Washoe Tribe of Nevada and California. Other compliance actions are identified as mitigation and monitoring measures as part of the cultural analysis in Chapter 4. During the consultation process, if any of the tribes identify priority culturally sensitive areas, a qualified archeologist may be required to be present during construction in those areas.

9-2

The Avian Power Line Interaction Committee (APLIC) prepared a comprehensive study entitled, "Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 1996." Copies may be obtained from the Carpenter Nature Center, 12805 St. Croix Trail South, Hastings, MN 55033, or by calling 612-437-4359.

## Comments

## Responses

### Letter 10

December 15, 2003

Terri Knutson, Project Manager  
Bureau of Land Management  
5665 Morgan Mill Rd.  
Carson City, NV 89701

Dear Ms. Knutson:

Please find attached the Reno-Sparks Indian Colony's comments on the Tracy-Silver Lake Transmission Line Project Draft Environmental Impact Statement. We have provided comments from both our administration, and from our cultural committee. We have been pleased with the cooperation from the BLM during this process, and look forward to finding an environmentally sound means of accomplishing this projects goals.

However, as explained in our comments, we still have several concerns that this EIS has yet to address. Key among these is the fact that an analysis of a transmission line has been conducted, while this will be designated a corridor. The potential impacts of the corridor can far exceed those of a single transmission line, and we hope that you explore this further.

We have also noted that the proposed route conflicts with our Comprehensive Plan. We insist that BLM remember that it must fulfill the Federal government's trust obligation to Indian tribes, and continue working with us to mitigate this conflict as much as possible.

Although our gravest concerns arise from the segment that Sierra Pacific has proposed to run through Hungry Valley, we also have concerns with the overall route, regardless of proximity to our lands. During meetings with our members, it has become evident that general concerns with environmental damage have surfaced, including disturbance of plant life, wildlife habitat, and impairment of visual aesthetics. Additionally, we have concerns that Native American cultural resources may experience damage, and have described some mitigation measures we think appropriate. However, we recognize that BLM will continue the consultation process with us throughout the EIS process.

Finally, we have not recommended a specific route because this only shifts the burden of the environmental consequences to other people rather than solving the problems of any of our communities. Our Tribal Council will make a determination of how they wish to proceed during the remainder of the EIS process, and specific recommendations will emerge from continued consultation between the Reno-Sparks Indian Colony and BLM.

Respectfully Submitted,

Arlan D. Melendez, Chairman  
Reno-Sparks Indian Colony

	Comments	Responses
	<p><b>Tracy-Silver Lake Transmission Line Project</b></p> <p><b>Letter 10 Reno-Sparks Indian Colony Draft EIS Comments</b></p> <p><b>I. Project should be examined as a utility corridor</b></p> <p>Throughout the EIS, this project has been analyzed as a power line. However, according to the Regional Plan Update, any power line over 60kv becomes a corridor by definition. (2002 Regional Plan Update, 64)</p>	
<b>10-1</b>	<p>At both the public meetings at RSIC and at the county CAB meetings, Sierra Pacific Power Company (SPPCo.) has noted that it has no intentions to place any more power lines within this corridor. While the permitting agencies (Washoe County, Reno, and Sparks) can condition SPPCo.'s special use permit, it is doubtful that a condition could put in place that effects the future rights of other companies without denying them due process. Furthermore, the existence of such a condition at this point is pure speculation. Thus, failure to examine this project as a corridor, except for on brief mention in Table 4-31, misleads the public as to the potential impacts caused by creating this corridor.</p>	<p><b>10-1</b> SPPCo has applied for a permit to construct and operate a 120 kV transmission line and subsequent substations. The determination of a utility corridor would be made by the Truckee Meadows Regional Planning Agency. Development of a utility corridor would represent a future action and is therefore analyzed as a cumulative impact in Chapter 4.</p>
<b>10-2</b>		
<b>10-3</b>	<p>While the Draft EIS acknowledges that this is indeed a corridor, it fails to consider the full ramifications of the potential cumulative impacts. NEPA requirements include examination of these cumulative impacts, and they are defined to include "reasonably foreseeable future actions." (40 CFR §1508.7) The Draft EIS acknowledges the creation of a corridor, and notes, "...other utilities or expanded electrical service would be encouraged." (DEIS, p. 4-84, Table 4-31) This acknowledgement also notes that most of the new corridor would not be suited to higher voltage power lines. However, future utility development is reasonably</p>	<p><b>10-2</b> Refer to response 10-1.</p> <p><b>10-3</b> Refer to response 10-1. Table 4-31 has been revised to state, "The Tracy to Silver Lake corridor <b>could</b> become a designated regional utility corridor...and other utilities or expanded electrical service <b>could</b> be encouraged."</p>

## Comments

## Responses

10-4

foreseeable, and the Draft EIS fails to examine the future development of this corridor.

10-4

Refer to response 10-1.

10-5

Since the beginning of the EIS process, RSIC has maintained that there is a difference between analyzing a power line and analyzing a utility corridor. RSIC still maintains that this project should be analyzed as the latter, and that all alternatives should be considered as such, unless some solid restriction, beyond mere speculation, limits development to this one project.

10-5

Comment noted. Refer to response 10-1.

### II. Conflicts with Reno-Sparks Indian Colony Comprehensive Plan

The Draft EIS acknowledges that the RSIC Comprehensive Plan includes a sphere of influence extending for one mile from the borders of the Hungry Valley community. The Draft EIS also notes that the plan discourages concentration of heavy industrial development and retention of open space, and is inconsistent with this project.

RSIC has no permitting authority for this project, and therefore relies on BLM, as an agent of the federal government with trust responsibilities to Indian tribes, to assist in resolving conflicts with the RSIC Plan. On several occasions, we have reminded the BLM that it has a trust obligation in this matter to protect the Colony, its members and its lands. The trust responsibility applies not only to on-reservation dealings with tribal property but also to federal action *outside* Indian lands which affect a tribe. See Northern Cheyenne Tribe v. Hodel, 12 Ind. L. Rep 3065 (D. Mont. 1985), *rev'd in part on other grounds*, 851 F.2d 1152 (9th Cir. 1988)(mineral leasing by BLM); Pyramid Lake Paiute v. Navy, 898 F. 2d

## Comments

## Responses

10-6

1410 (9th Cir. 1990); Eric v. Secretary of the United States Department of Housing and Urban Development, 464 F. Supp. 44, 49 (D. Alaska 1978)(“trust doctrine is not limited to situations in which the government is managing property owned by an Indian tribe”). The Federal Land Policy and Management Act §202(c)(9) reinforces this duty and requires the Department of Interior “keep apprised of State, local, and tribal land use plans that are germane in the development of land use plans for public lands; [and] assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government Plans.” (FLPMA §202(c)(9), see also, BLM Handbook H-1701-1 at III-10) At this time, no mitigation within the RSIC sphere of influence has been discusses, and RSIC recommends that BLM, SPPCo., and RSIC work to find effective mitigation for the impacts to Hungry Valley.

### III. Cultural Resources

RSIC recognizes that analysis of the effects of this project on cultural resources continues throughout this process. But, during BLM’s presentation to the RSIC community, concerns regarding potential impacts to cultural resources have already surfaced. The primary concern expressed during that meeting regarded oversight during construction of the proposed power line. Members of the RSIC community recognized that priceless cultural resources could surface during construction, and that their preservation should be ensured.

10-7

BLM has suggested in the DEIS that any unanticipated finds would cause a cessation of construction until a BLM specialist allowed construction to continue. (DEIS p. 4-81)

10-6

The only impact to Hungry Valley that has been identified is visual (and resultant conflict with the RSIC Master Plan). As stated in Chapter 4 under the “Aesthetic Resources and Noise” section, visual impacts from KOP 6 would be minor. No impacts have been identified that would require mitigation, however, other alternatives are included that would eliminate effects within the sphere of influence.

10-7

Refer to response 9-1.



	Comments	Responses
10-7 cont'd	However, no mitigation was suggested to ensure that such finds were recognized in the first place. To ensure that these irreplaceable resources receive the attention they deserve, on-site monitors trained to recognize the importance of any archaeological find be included as a condition by the permitting agencies (including BLM). Also, the	
10-8	recommended mitigation states, “In coordination with the BLM and SHPO, the project archaeologist would evaluate the potential significance of the find and would determine what treatment measures, if any, are appropriate.” (Ibid.) RSIC recommends that this evaluation should also include RSIC and other effected tribes, especially if the finds contain Native American cultural resources.	10-8 Text added to include tribal consultation.
10-9	The Draft EIS recommends that BLM and SHPO develop a treatment plan to mitigate adverse effects on NRHP-eligible sites. (DEIS p. 4-80) Again, RSIC would recommend inclusion in the development of such a plan.	10-9 Text added to include tribal consultation.
10-10	Native American religious concerns also need to receive adequate attention. However, deems any open discussion of such sites imprudent, and will seek to address such issues within the bounds of confidentiality required by Executive Order 13002 (“Where appropriate, agencies shall maintain the confidentiality of sacred sites”).	10-10 Comment noted.
	<b>IV. Cumulative Impacts</b>	10-11 Refer to response 10-1.
10-11	As stated earlier, cumulative impacts must include reasonably foreseeable developments. As a corridor, this EIS should include, at a minimum, the types of utility projects for which this corridor would be suited. Additionally, the DEIS notes that higher	10-12 Based on further review, it has been determined that the TMRPA has the authority to make the determination of suitability. The sentence has been deleted from table 4-31.
10-12	voltage lines would not be suitable for much of this corridor. However, the public does	

## Comments

## Responses

**10-12 cont'd** not know which segments of the alternatives would be suitable for such lines. The DEIS also notes that future utility projects would be encouraged to be placed within this corridor, so expansion beyond suitability is a reasonably foreseeable future development, and should also receive attention.

### V. Environmental Justice

**10-13** According to the DEIS, RSIC will not experience disproportionate environmental effects due to this project. (DEIS p. 4-71) RSIC recognizes that such disproportionate impacts could surface as research continues, however.

**10-14** Additionally, the cultural resources analysis is continuing. While RSIC may not bear a disproportionate share of the impacts in other regards, it should be acknowledged that the impacts to cultural resources might be borne disproportionately by Native American. Additionally, impacts to religious sites, as mentioned in the DEIS will only affect Native Americans, and thus are disproportionate.

### VI. RSIC Community Meeting Results

BLM and SPPCo. have made presentations to the RSIC community and Tribal Council during the scoping phase of the EIS and during the Draft phase. Additionally, staff has met with community members in separate meetings to further discern the concerns of the community.

**10-15** While the community has raised several concerns, only two included specific recommendations for mitigation. The first was to condition any approval on having on-site monitors who can recognize cultural resources. The second was to include

**10-13**  
Comment noted.

**10-14**  
There would be no known impacts to cultural resources, however mitigation has been developed in Chapter 4 to avoid and minimize any unforeseen effects. Refer to response 9-1.

**10-15**  
Refer to response 9-1.

## Comments

10-16

anti-perching devices, or other measures, in order to protect avian life wherever it maintains its normal habitat.

The list that follows includes the issues that community members raised at the various meetings. These did not include specific recommendations for mitigation, but nevertheless deserve consideration during this process (some have received further attention in the preceding text).

- 10-17 | Impact to Wildlife – particularly avian life
- 10-18 | Visual impact of power lines and maintenance road
- 10-19 | Impact to cultural sites
- 10-20 | Creation of a utility corridor
- 10-21 | Reclamation of land (what will be done to ensure its success)
- 10-22 | Environmental Justice
- 10-23 | B.L.M.'s trust responsibility to the Reno-Sparks Indian Colony
- 10-24 | Noise – high frequency vibration
- 10-25 | Height impacts
- 10-26 | Cumulative impact of incompatible land uses
- 10-27 | Hungry Valley will lose its feeling of “pristine” environment
- 10-28 | Maintenance roads will be used by everyone
- 10-29 | Enforcement and safety issues and who will patrol
- 10-30 | Staging areas located near culturally sensitive area
- 10-31 | Lightning, arcing, and fire danger
- 10-32 | Impact to RSIC community plans for expansion
- 10-33 | Earthquake faults and the potential safety issues in the event of an earthquake
- 10-34 | Impact to property values
- 10-35 | Is the need for the transmission line established (is there a study)?
- 10-36 | Impact of the line in relation to the cost to mitigate
- 10-37 | Baseline study – how was the preferred line established
- 10-38 | Exclusive scoping process – it should include Reno NABs, Sun Valley CAB, and Sparks
- 10-39 | Impact to the Reno-Stead Airport and the Reno Air Races
- 10-40 | Soil Erosion
- 10-41 | Impact to plant life
- 10-42 | Impact to BLM land base – will this cause BLM to dispose of more public lands?
- 10-43 | Will this require safety lights on poles?

## VII. Conclusion

RSIC recognizes that this document does not close the EIS process. Consultation between BLM, other agencies, and RSIC will continue.

## Responses

10-16

As discussed in Chapter 4 Wildlife resources, the proposed configuration of the transmission line would have a minimum spread of 8 feet vertically, 11 feet horizontally, and 5 feet wire to pole. The spacing of the wires as referenced is enough to preclude the electrocution of birds. The Avian Power Line Interaction Committee (APLIC) prepared a comprehensive study entitled, “Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 1996.” Findings of this report were incorporated into the development of mitigation measures. Likewise, while there is always a risk of bird collision with utility lines, the risk in the referenced area is relatively low because there are no water bodies or other unique habitat features nearby to attract birds.

10-17

Impacts to wildlife are evaluated in Chapter 4 under the “Wildlife Resources” and “Special Status Species” sections.

10-18

Visual impacts from power lines and maintenance roads are evaluated in Chapter 4 under the “Aesthetic Resources and Noise” section.

10-19

Impacts to cultural sites are evaluated in Chapter 4 under the “Cultural Resources and Paleontology” section.

10-20

Refer to response 10-1.

10-21

A Reclamation Plan has been developed and is provided in Appendix B, and also includes monitoring and reporting protocols.

10-22

Environmental Justice is addressed in Chapters 3 and 4 under the “Socioeconomics and Environmental Justice” sections.

10-23

Impacts to cultural sites are evaluated in Chapter 4 under the “Cultural Resources and Paleontology” section.

## Comments

10-44

At this point RSIC does not have a preferred route. RSIC would recommend continued consultation, especially on key concerns that community and staff have raised. RSIC would recommend specific mitigation of the Tribe's concerns be worked out, if possible, prior to the release of the final EIS.

## Responses

10-25

Visual impacts from the height of the transmission poles are discussed in Chapter 4 under the "Aesthetic Resources and Noise section".

10-26

Refer to Chapter 1-Subheading "Reno Sparks Indian Colony Comprehensive Plan".

10-27

Comment noted. Visual impacts are discussed in detail in Chapter 4 under the "Aesthetic Resources and Noise" section. The final selected route will take into account the varying degrees of impacts to all resources, including visual resources.

10-28

The greatest impact to the maintenance roads will be from OHV users and other recreational patrons. The Proposed Action would follow existing roads within Hungry Valley. In addition, impacts from increased recreational use on the maintenance roads are discussed in chapter 4 under the "Recreation and Areas of Critical Environmental Concern" section.

10-29

Safety issues are addressed in chapter 4 under the "Public Health and Safety" section. Refer to response 9-1.

10-30

Impacts to culturally sensitive areas are addressed in Chapter 4 under the "Cultural Resources and Paleontology" section.

10-31

Lightning, arcing, and fire danger impacts are addressed in Chapter 4 under the "Public Health and Safety" section. Additional details regarding lightning and arcing were added to the "Public Health and Safety" section in Chapter 4.

## Comments

## Responses

### 10-32

The BLM is unaware of any formal application for expansion.

### 10-33

Earthquake fault zones are identified in Chapter 3 under the “Geology and Soils” section. Impacts from Earthquakes are evaluated in Chapter 4 under the “Geology and Soils” section.

### 10-34

The impact to property values is addressed in Chapter 4 under the “Socioeconomics and Environmental Justice” section.

### 10-35

Refer to the Purpose and Need section in Chapter 1.

### 10-36

The selection of mitigation will be provided in the ROD. To provide the reader a context in scale, the estimated cost of undergrounding is provided in Chapter 2 in table 2-1.

### 10-37

The Proposed Action was derived by SPPCo based upon the purpose and need as described in Chapter 1. A Preferred Alternative will be designated during the Final EIS process by the Cooperating Agencies and the BLM.

### 10-38

The DEIS was presented to the Sun Valley CAB on 11/8/2003. The DEIS was presented to the City of Sparks Planning Commission on December 18, 2003 and to the City of Sparks City Council on January 12, 2004. The DEIS was presented to the North Valley NAB on November 17, 2003 and to the Red Rock Property Owners Association on November 18, 2003.

### 10-39

Aircraft safety impacts are discussed in detail in Chapter 4 under the "Public Health and Safety" section. The final selected route will take into account the varying degrees of impacts to all resources, including the Reno Air Races. In addition, the BLM will seek guidance from the FAA on mitigating impacts surrounding the Spanish Springs and Reno-Stead Airports. Refer to response 2-1.

## Comments

## Responses

### 10-40

Erosion is addressed in Chapters 3 and 4 under the “Geology and Soils” sections.

### 10-41

Vegetation is addressed in Chapters 3 and 4 under the “Vegetation and Wetlands” sections.

### 10-42

The project will not require the disposal of public lands.

### 10-43

No lights will be added to the transmission line poles unless required by the FAA during the permitting process.

### 10-44

Comment noted. The BLM will consult with the RSIC Tribe throughout the EIS process. As a cooperating agency, the Tribe will participate in identifying a preferred route and mitigation measures to be implemented along that route in the Final EIS.

Letter  
11



Washoe County  
Department of  
Community  
Development  
Planning Division  
1001 E. North St., Bldg. A  
Post Office Box 11130  
Reno, NV 89520-0027  
Tel: 775-328-3600  
Fax: 775-328-3648

## Comments

Bureau of Land Management  
Carson City Field Office  
Attn: Terri Knutson, EIS Project Manager  
5665 Morgan Mill Road  
Carson City, NV 89701

2004 JAN 20 PM 12:31

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

RE: Review and Comment on the Adequacy and Accuracy of the Draft Environmental Impact Statement for the Tracy-Silver Lake Transmission Line Project.

Dear Ms. Knutson,

Washoe County, in accordance with its status as a cooperating agency, has completed its review on the adequacy and accuracy of the Draft Environmental Impact Statement for the Tracy-Silver Lake Transmission Line Project. The review consisted of an initial analysis by Washoe County staff with additional review and comment by the Washoe County Planning Commission on January 6, 2004 and Washoe County Board of County Commissioners on January 13, 2004. Please find attached, for consideration in the Final Environmental Impact Statement, a cumulative body of comments from these reviews.

Following the 1-27 numbered comments are five individual comments made by County Commissioners at their January 13, meeting. The County Commissioners also took the position that the BLM should consider all the alternatives that have been proposed that are within the DEIS or that were not included in the DEIS. Most notably the "North Valleys Alliance" Alternative (see comments submitted to the BLM by Ms. Lori Burke) and the urging of Spanish Springs residents to place the lines underground through residential areas (see comments submitted to the BLM by Ms. Pam Lambert).

Attached to the county's cumulative comments, at the request of the Commissioners, are letters pertaining to the detrimental effects on the National Championship Air Races of an overhead transmission line along the western boundary of the Reno-Stead Airport. Additionally, the Red Rock Estates Property Owners Association requested that their comments submitted through the law firm of Lionel, Sawyer and Collins, dated December 15, 2003 be included in the Commission meeting minutes, so this correspondence has been attached.

Should you have any questions, or require clarification regarding the attached comments, please do not hesitate to contact me, at 328-3617. Thank you for the opportunity to comment.

Adrian P. Freund  
AICP, Director



BW/bw

Sincerely,

*Bill Whitney*  
Bill Whitney, Senior Planner

## Responses

### 11-1

The BLM has not received a graphic depicting the North Valley Alliance Alternative, however, as it was described at the January 6, 2004 Washoe County Planning Commission Meeting, the route was interpreted to follow the western portion of the Existing Corridor Alternative as already analyzed in the DEIS. Additionally, the North Valley Alliance Alternative does not meet the purpose and need because it does not identify a route from Tracy to Spanish Springs or include the Spanish Springs substation.

### 11-2

Comment noted. As stated in the beginning of Chapter 4, undergrounding is a mitigation measure intended to reduce impacts, and if applicable, will be identified as part of the Record of Decision.

## Comments

Subject: Tracy to Silver Lake Transmission Line DEIS  
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Page 2

To supply reference and context, each comment is preceded by the page number and respective paragraph (within the DEIS document) that the comment addresses. Comments are listed in order of page reference and not in order of importance or significance.

- 11-3** 1) (Pg. 2-7, ¶3 also 4-52, ¶7) The proposed substation location is adjacent to existing commercial and residential land uses, lending itself to mitigation options that are not included in the DEIS. Other physical substation enclosures more aesthetically pleasing than a 6'6" chain link fence with barbed wire on top should be considered. An alternative would be masonry type walls with landscape screening such as shrubs and trees.
- 11-4** 2) (Pg. 2-27) This section lists the reasons why bringing power out of the Border town substation to feed the Stead area would not work well. This section also needs to more adequately address conflicting statements made by the Sierra Pacific Power Company during the approval process for the Alturas 345kV Transmission Line project. The Alturas Final EIS (November 1995) contained a section that spoke directly to future power needs in the North Valleys being supplied from the Bordertown Substation. *E.3.3.3.1 Expansion due to New Growth in SPPCo Service Area*. "If the Alturas Transmission Line Project were approved as proposed, and growth in the North Valleys warranted a 120kV transmission addition, then SPPCo would consider the addition of a 345/120 kV transformer at the Bordertown Substation and a 120kV transmission feed to the Silver lake Substation".
- 11-5** 3) (Pg. 2-28, ¶4) A more adequate explanation is needed as to why a substation site immediately south of La Posada and the ball fields at the Pyramid Highway is not addressed in the DEIS as a viable alternative.
- 11-6** 4) (Pg.4-3, ¶2) The paragraph should include text that states: The Regional Planning Commission is scheduled to hold a workshop on the RUCR's conformance with the Regional Plan on January 28, 2004. Following this, Regional Planning staff will process a Regional Plan Amendment to incorporate the report by reference into the Truckee Meadows Regional Plan. This action will direct its use in reviewing the conformance of the proposed transmission line".
- 11-7** 5) (Pg. 4-5) The section pertaining to the proposed substations is missing from this part of the document.
- 11-8** 6) (Pg. 4-8, ¶9) Engineers should normally be designing "low-EMF" lines and "low-visibility" lines when feasible. These two practices should be a part of any utility route design and should conversely not be considered as key mitigation measures. The undergrounding of power transmission lines and off-site mitigation should be the two key components of mitigation measures for this proposal.

## Responses

### 11-3

The Chapter 2 substation description has been revised to read, "The site would be surrounded by a wall...landscaping would be consistent with the surrounding area." In addition a typical substation photograph has been added to Chapter 2.

### 11-4

The explanation under the Border Town Substation to the Silver Lake Substation Alternative that was considered but eliminated has been revised to read the following:

#### Bordertown Substation to the Silver Lake Substation

During scoping it was suggested that power be brought out of the Bordertown Substation to meet capacity needs in the Stead area. The Bordertown Substation is about 15 miles northwest of Stead and is part of the Alturas 345 kV transmission line system. Bringing power out of the Bordertown Substation was also identified in the analysis of the Alturas 345 kV Transmission Line Project. The Alturas FEIR stated the following: "As growth in the Stead area occurs, expansion of additional transmission facilities to the area would be required. Currently, Stead is served by an existing 60 kV transmission system that is capable of reliably serving approximately 43 MW of load. In 1994, the peak demand was 26.5 MW. Depending on the rate of growth, a 120 kV transmission addition could be required within the next 5 to 10 years (SPPCo, 1995c).

In its long range planning studies, SPPCo has identified two options for servicing future Stead growth: 1) a 120 kV source into Silver Lake Substation from Tracy and 2) a 120 kV source into Silver Lake Substation from Border Town. If the Alturas Transmission Line Project were approved as proposed, and growth in the North Valleys warranted a 120 kV transmission addition, then SPPCo would consider the addition of a 345/ 120 kV transformer at the Border Town Substation and a 120 kV transmission feed to the Silver Lake Substation. At the time such plans are developed, anew applications would be required by responsible agencies. Future applications would be subject to a separate environmental review."

As stated in the preceding paragraphs, bringing a 120 kV feed out of Border Town to the Silver Lake Substation was one of two options that were identified to address future growth in Stead. The other option was to bring a



## Comments

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Page 3

- 11-9 | 7) (Pg. 4-22, ¶3) Include text that states, "Relocating the right-of-way, if possible, is preferable to reducing its width within these sensitive areas".
- 11-10 | 8) (Pg. 4-33, ¶2) Correct the text to read, "Sage Grouse predators such as raptors and ravens have been documented as utilizing perches on transmission line towers to more easily prey on Sage Grouse".
- 11-11 | 9) (Pg. 4-34, ¶5) Text should state: "The Northern Alternative goes through key Sage Grouse habitat in the Pah-Rah Range" (Nevada Department of Wildlife). This could also affect the "impact ratings" for Special Status Species in Table 4-16 on page 4-33.
- 11-12 | 10) (Pg. 4-44, ¶6) Include "Reno-Stead Airport" to clarify this paragraph.
- 11-13 | 11) (Pg. 4-46, ¶7 and Pg. 4-48, ¶2) Text in these two sections describe portions of the Northern Alternative transmission line that would be build in undeveloped areas of public land that do not presently contain any existing power lines. In both instances the conclusion is that the visual impacts on BLM land would be minor. In the first instance, the visual impact is considered minor because a person standing at "Key Observation Point" (KOP) 5 cannot see much of the BLM land that the line impacts. In the second instance, the visual impact is considered minor again because the new 120kV transmission poles would be similar to the 25kV distribution poles that run perpendicular to the Northern Alternative route as it enters Antelope Valley. This illustrates how subjective the evaluation of aesthetic resources can be in the EIS process, which is problematic since the most significant impacts associated with the proposed project are visual impacts.
- 11-14 | 12) (Pg. 4-54, ¶4) The locations that have some of the highest degree of applicability for undergrounding are summarily dismissed by statements in this paragraph. The statement and conclusions are erroneous. The majority of existing residential and all future residential in The La Posada Drive area have or will have underground power distribution lines, so are not similar to the proposed transmission line. "Cultural modifications, such as homes and streets", will of course be built, but these do not carry the same visual impacts as overhead 120kV transmission lines on 70-foot poles. The DEIS statement that "the beneficial impacts of placing the transmission line underground would be temporary, so it is not recommended" has no standing. Undergrounding should be a viable mitigation along La Posada and in all similar locations along the Proposed Action and the alternatives.
- 11-15 | 13) (Pg. 4-54, ¶6) A visual impact "trade-off" that merits more exposure in the DEIS, is that of the large metal tower that is required at each end of an underground segment. The DEIS should contain analysis of if these towers are more of a negative visual impact than the 120kV powerline itself. Figure A-4 in Appendix A is a color photo of what a 120kV line would look like going underground

## Responses

120 kV feed from Tracy to the Silver Lake Substation. The second option was selected for the following reasons:

Bringing power out of the Border Town substation to feed the Stead area would not provide a 120 kV link between Silver Lake and Sugarloaf, so there would not be a power supply loop to meet the reliability and capacity needs of the Spanish Springs area. Additionally, the 120 kV loop from Tracy through Spanish Springs to Stead is required to prevent system overloads during outages. A system overload occurs when there is too much power flowing through the system and causes equipment to fail. The current 120 kV system has overloading problems caused by outages on the 345 kV system.

Lastly, bringing power out of the Border Town Substation to feed the Stead area requires a significant upgrade to the substation, which is not set up to provide for a 120 kV infrastructure. SPPCo estimates that the rebuild of 2.5 miles of 345 kV double circuiting and the 345/120 kV transformer additions at Border Town would cost approximately \$6,000,000 additional dollars and, as discussed above, would still not meet all of the objectives of the purpose of and need for the project. The proposed transmission lines from Silver Lake to Sugarloaf and Tracy to Sugarloaf would still need to be built. For these reasons, the Border Town Substation Alternative was considered but eliminated.

Connecting to the Bordertown substation does not meet the evaluation criteria. Refer to Chapter 2, section "Alternatives to the Proposed Action" section.

### 11-5

Comment noted. The following text has been added to Chapter 2 under the Alternatives Considered but Eliminated (Pah Rah Substation Locations) section, "The ECI report determined that, "A substation location south of La Posada Road would make it more difficult to serve new loads as they develop north of La Posada Road."

### 11-6

Text added.

### 11-7

The following substation information is already included on page 4-3 of the DEIS, first paragraph:

"In the short term, the Proposed Sugarloaf Substation and Proposed Reno-Stead Airport Substation would disturb approximately four acres each and in

## Comments

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- 11-16 | 14) (Pg. 4-57, ¶4) The most stringent state standard for “magnetic field value” was listed in the text; to be consistent, the same should be listed for the “maximum calculated electric field value”.
- 11-17 | 15) (Pg. 4-57, ¶7) Correct the wording “described below” to read “on page 4-61”.
- 11-18 | 16) (Pg. 4-57, ¶5) The statement “The surrounding equipment, supporting structures, substation fence, and other nearby objects typically shield the electric field from substation equipment”, does not make sense in that sections context.
- 11-19 | 17) (Pg. 4-58, ¶2) Conflicting information exists concerning the future of the National Championship Air Races if the transmission line is built along the proposed alignment on the western edge of the Reno-Stead Airport property. All that the DEIS says about this is that the Proposed Action alignment is “within the safety zone for the racecourses”. It is unclear what this means. This question needs to be answered in the FEIS. The Reno Air Race Association sent a letter to the BLM, dated December 10, 2003, stating that the Federal Aviation Administration “has assured us that should the power line be erected, the FAA waivers, necessary for the operation of the Reno Air Races would be withheld”. “Without the waiver, the Reno Air Races could not operate at Stead Airport, resulting in the annual loss of over \$55 million in economic impact to the Reno/Sparks community”. Additionally, staff has not seen any correspondence that indicates the Air Race Association has commented on either the proposed or alternative substation sites located at the northwestern corner of the airport.
- 11-20 | 18) (Pg. 4-60, ¶6) The text for the Existing Corridor Alternative should be corrected to reflect the fact that this alignment crosses much less undeveloped land and would pose less of danger of starting a wildfire from problems such as “flashover” to the ground.
- 11-21 | 19) (Pg. 4-61, ¶6) Identify this policy as being from the Regional Utility Corridor Report.
- 11-22 | 20) (Pg. 4-66, ¶5) Figure 3-8 does not include these Recreation and Public Purposes areas. The designation would be more appropriate to add to Figure 3-9.
- 11-23 | 21) (Pg. 4-69, ¶1) Land acquisition figures are not calculated into the cost estimates for the proposed action and alternative routes. Reliability of these cost estimate figures is compromised by this omission and the cost estimates are misleading. The statement is made that “The cost of the Existing Corridor Alternative would be twice the Proposed Action, but this alternative (Existing Corridor) would likely require the least land acquisition”. The total actual costs for each alternative could vary greatly from what is found in the DEIS depending upon land and easement acquisition costs.

## Responses

the long term would disturb a total of about 2.5 acres each, both of which are minor, localized impacts. The Proposed Sugarloaf Substation would be located on privately owned land in the Spanish Springs Valley and the Proposed Reno-Stead Airport substation would be located on the Reno-Stead Airport; the Airport Authority of Washoe County owns the property.” Therefore, no changes have been made.

### 11-8

SPPCo designs low EMF and Low visibility lines as feasible. The referenced text was taken from the RUCR as part of the outline for standard mitigation. Undergrounding of the transmission line is proposed as mitigation for this proposal. See figure 4-1.

### 11-9

Text Revised.

### 11-10

Change not made. The suggested change implies that scientific research has documented that raptors and ravens specifically use transmission lines to more easily prey on sage grouse. Our research has not been able to confirm this specific behavior.

### 11-11

Although the northern route does cross several miles of land within the NDOW identified Pah Rah sage grouse range, field investigations determined this area to lack enough high quality sage brush habitat to be called “key” sage grouse habitat.

Most of the sage habitats in the project area have burned in the fairly recent past. The vegetation is dominated by cheatgrass, with some sparse sage.

No good quality habitat for the Pah Rah sage grouse populations was observed along any portion of the proposed alignment and its alternatives. In general, the paucity of sagebrush and the invasion of cheatgrass have contributed to the decline of suitable sage grouse habitat in this area; nevertheless, there were two small areas containing marginally suitable habitat. One of these areas was located along approximately two miles of the northern route.

## Comments

Memo to: Bureau of Land Management  
Subject: Tracy to Silver Lake Transmission Line DEIS  
January 14, 2004  
Page 5

- 11-24 | 22) (Pg. 4-75, ¶8) The statement about “value change” does not make sense.
- 11-25 | 23) (Pg. 4-76, ¶1) Not a correct statement. The site is adjacent to existing commercial and residential land use. Consideration should then be given as to whether there are socioeconomic impacts involved at this location.
- 11-26 | 24) (Pg. 4-78, ¶1) The “Southern Alternative” as a bold heading is missing from this page.
- 11-27 | 25) (Pg. 4-84, Table 3-31) The DEIS fails to analyze the future and cumulative impacts of establishing a new regional utility corridor. Text in this table references the Regional Utility Corridor Report when it states that “other utilities or expanded electrical service would be encouraged”. The FEIS should include the types of utility developments for which a newly established utility corridor would be suited and the associated impacts. The text in this table also states that “Most of the Tracy to Silver Lake corridor would not be suited to higher voltage transmission lines. This is unclear, contradictory and confusing as written and does not inform the reader as to which segments of the alternatives *would* be suitable for higher voltage lines.
- 11-28 | 26) Include figures in the FEIS that show the average cost per mile for underground construction of a 120kV transmission line.
- 11-29 | 27) Include the “Proposed and Alternative Routes” composite map in the FEIS.
- The following five comments were made by individual County Commissioners at their January 13, 2004 meeting.
- 11-30 | • “The DEIS is inadequate because it does not identify preferred underground segments for the Preferred Action or Alternatives.”
- 11-31 | • “Do not support the Northern Alternative.” “Do not include the Northern Alternative as an alternative in the FEIS.”
- 11-32 | • “Support the Existing Corridor alternative mainly because it utilizes the already existing Alturas corridor.”
- 11-33 | • “Undergrounding the transmission line in residential areas that already have underground distribution lines should be preferred.”
- 11-34 | • “Support supplying power to the North Valleys from the Alturas Bordertown substation.” “Keeping North Valleys power lines separate from those in Spanish Springs will negate the need for the lines to cross the entire North Valleys.”

End

## Responses

11-12  
Text added.

11-13  
The impact to visual resources was done using the BLM visual contrast rating system. The impacts were analyzed from Key Observation Points and took into consideration the form, line, color, and texture of the land/water, vegetation, and structures at each site.

11-14  
Comment noted.

11-15  
A visual simulation depicting the same location as in Figure A-4 with a proposed 120 kV transmission line pole has been added to Appendix A for comparison.

11-16  
Change made.

11-17  
Text changed to read “As described in the Mitigation and Monitoring section below”. Page numbers are not referenced due to formatting.

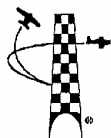
11-18  
Text revised

11-19  
Refer to response 2-1. The Airport Authority has not voiced concern regarding the northwestern corner of the airport property.

11-20  
As discussed in the Proposed Action, the potential for wildfire from transmission lines is extremely low. While fuel loading may be greater under other alternatives, the hazard of an ignition is negligible across alternatives.

11-21  
Text Added.

## Comments



# NATIONAL CHAMPIONSHIP AIR RACES

RENO AIR RACING ASSOCIATION, INC.

Michael J. Houghton, President and CEO  
Reno Air Racing Association

2004

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John P. Sande III  
Jack Wallicher, DVM  
Dan Watkins

January 12, 2004

Ms. Katy Singlaub, County Manager  
Washoe County  
Post Office Box 11130  
Reno, NV 89520

VIA FACSIMILE: 775/328-2037

Dear Katy:

The Bureau of Land Management (BLM) has been receiving public comment regarding the issues associated with the proposed Tracy Power line, and I wanted to go on record to convey our organization's opposition to the proposed, above-ground route along the western boundary of the Reno Stead Airport.

We have been advised the by the Federal Aviation Administration (FAA) that should this proposed above-ground route be implemented, it would, in fact, shut down the Reno Air Races.

There are alternative routes and/or alternative installations that would be acceptable, although it would seem that most logical to us to bury the lines underground along that western corridor. The above-ground proposal will serve as the death knell for the Reno Air Races.

I have enclosed copies of letters from the FAA as well as those from Krys Bart and the Air Races to the BLM.

Sincerely,

Michael J. Houghton  
President and CEO

MJH:ew

Enclosures

cc: Members of the Washoe County Commission  
Members of the Washoe County Planning Commission  
Adrian Freund, Director, Washoe County Department of Community Development

September 16-19, 2004

## Responses

11-22

The text in Chapter 3, under the Recreation and Areas of Critical Environmental Concern-Washoe County section has been changed to state, "There are several tracts of BLM land in the project area that have been designated for disposal for use by state and local government through the Recreation and Public Purposes Act (Figure 3-9). For example The lands designated for disposal at the Spanish Springs Airport lease location have been added to the Recreation and Public Purposes (R&PP) designation. The airport lease will continue until such time as the airport is not compatible with the surrounding development or interest in continued airport operation ceases. These lands will then be managed consistent with an R&PP designation (BLM 2001)." In addition, figures 3-8 and 3-9 have been revised to identify the locations of these R&PP designations.

11-23

Cost estimates for land acquisitions have been added to this section and the DEIS table 2-3.

11-24

The sentence has been deleted and replaced with estimated cost values.

11-25

Text has been revised to state "...The Alternative Sugarloaf Substation could have a minor effect on property values because the adjacency of an electrical substation adjacent to a residential use could affect property values. This effect is expected to be minor because of the large size of the residential property adjacent to the alternative substation site and because the substation would utilize low-profile equipment where feasible."

11-26

Change Made

11-27

Text in table 4-31 has been revised to read: "The Tracy to Silver Lake Transmission Line Route **could** become a designated regional utility corridor, and other utilities or expanded electrical service **could** be encouraged."

## Comments

## Responses

### 11-28

Refer to table 2-1 in the document. Table 2-1 will remain in the Final EIS.

### 11-29

The composite map has been added to the summary section of the document.

### 11-30

The FEIS will identify the preferred alternative. The ROD will spell out which mitigation measures will be implemented.

### 11-31

The Northern Alternative was developed from public input during the scoping process. It has been deemed a viable alternative and therefore must be included in the final EIS.

### 11-32

Comment noted.

### 11-33

Comment noted

### 11-34

Refer to response 11-4.

### 11-35

Comment noted.

### 11-36

Comment noted. Refer to Response 2-1.

### 11-37

Comment noted. Refer to Response 2-1.

### 11-38

Attachments are the same as Letters 2 and 3. Refer to responses 2-1 through 3-2.

## Comments

## Responses

Letter  
12



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2004 MAR -4 A 11:29

March 1, 2004

Terri Knutson  
Planning and Environmental Coordinator  
Bureau of Land Management  
Carson City Field Office  
5665 Morgan Mill Road  
Carson City, NV 89701

Re: Tracy-Silver Lake Transmission Line EIS

Dear Ms. Knutson:

Since 1998 the City of Sparks has participated in Regional Utility Corridor planning. In addition to the report published in 1999, the Truckee Meadows Regional Planning Governing Board recently amended this document to reflect adopted policies of the 2002 regional plan.

Regarding the Tracy-Silver Lake Transmission Line EIS, the Sparks City Council provided comments on January 12, 2004. Mayor Armstrong, in addition to other City Council members questioned the need to construct new utility poles for this line, and also the need to traverse the City of Sparks. It was also made clear that any transmission line of the nature proposed (120 kv) would only be acceptable if it is placed underground.

It is noted that the City of Sparks has exerted its extraterritoriality over the extended sphere of influence as described in the 2002 Truckee Meadows Regional Plan. This includes the East Truckee River Canyon from the present eastern city limits to the Tracy Power Plant. The city is currently in the process of developing a land use plan for this area. Any new development in the extended sphere requires review and approval by the City of Sparks, as well as a Special Use Permit. The comments of the City Council and of staff in developing regional utility corridor policies will be utilized in reviewing and conditioning any development in this area. Regardless of the route chosen, a special use permit from the City of Sparks will be required for any transmission line constructed in this area.

Another area of concern highlighted by the Sparks City Council is the proposed route along La Posada, currently the northern boundary of the city. This route could adversely impact some of the newest and highest value homes in the city. Furthermore, it could

Building	Community Development	Engineering
tel 775.353.2306	tel 775.353.2340	tel 775.353.2371
fax 775.353.2413	fax 775.353.1608	fax 775.353.7874

1675 East Prater Way | Suite 107 | P.O. Box 857 | Sparks, NV 89432-0857

12-1

Comment noted. See Chapter 1 under "Purpose and Need" section.

12-2

Comment noted. As stated in the beginning of Chapter 4, undergrounding is a mitigation measure intended reduce impacts, and if applicable, will be identified in the Record of Decision.

12-3

Comment noted.

12-4

Comment noted.

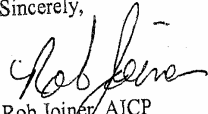
## Comments

- 12-4 | impact undeveloped property that is currently under consideration for high quality retail  
cont'd | commercial and business park development. The population in the North Spanish  
Springs area of Sparks is the fastest residential growth area in Washoe County and is  
expected to increase in population by approximately 40,000 over the next five years.
- 12-5 | Avoiding this and other high growth population centers should be the highest priority in  
determining the route of the subject transmission line. Therefore, either of the northern  
alternative routes, Winnemucca Ranch Road and Antelope Valley Road, or Calle de la  
Plata, avoiding the densest populated areas would be preferable to the "proposed route."

A representative of the Community Development Department will be in attendance for a  
portion of the meeting on March 4<sup>th</sup> to reiterate the City of Sparks' comments on the EIS.

If you have any additional questions, please contact me at the number below, or Current  
Planning Manager, Rob Pyzel at 353-2368. Thank you for the opportunity to comment  
on the Tracy-Silver Lake Transmission Line EIS.

Sincerely,



Rob Joiner, AICP  
Advance Planning Manager  
353-1509

## Responses

- 12-5  
Comment noted.

## Comments

Letter  
13

March 4, 2004

Hand Delivered  
3/4/04 JK



Terri Knutson  
Bureau of Land Management  
Carson City Field Office  
5665 Morgan Mill Rd  
Carson City, NV 89701

Dear Ms. Knutson:

As a cooperating agency in the Sierra Pacific 120kv Tracy-Silver Lake Transmission Line Environmental Impact Statement (EIS), the Reno-Sparks Indian Colony (RSIC) has taken a great interest in the eventual route that this line will follow. We have participated with the other cooperating agencies throughout the EIS process and recently the Tribal Council took full consideration of all available information to make a formal statement of its recommendations on the proposed route.

The Tribal Council recommends that the route that the transmission line takes follow one of the viable paths other than the one proposed through Hungry Valley. The route through Hungry Valley as proposed raises several concerns for RSIC, as does the alternate route that also runs through Hungry Valley, and these have been articulated in our comments on the Draft EIS. Our primary reasons for wishing the route to remain out of Hungry Valley are:

- 13-1 > Conflicts with the RSIC Comprehensive Plan. The route through Hungry Valley travels through RSIC's sphere of influence, and the plan makes clear that further development in the valley should be opposed. RSIC's goals are to maintain an environment suitable for residential development, and thus free from other uses. Hungry Valley also provides RSIC's Hungry Valley residents with readily accessible open space, and this project would compromise the integrity of open space uses for our residents.
- 13-2 > Cultural and religious sites. Sites containing cultural and/or religious sites have been identified to BLM during the EIS process. This project would compromise these sites, and proposed mitigation has been deemed ineffective at remedying these concerns. Even undergrounding of the line would not suffice, as digging into these sites would possibly compromise them even more than an above ground line.
- 13-3 > Aesthetic resource degradation. Although we recognize Sierra Pacific's efforts at mitigating the effects on the visual aesthetics in Hungry Valley, the power line would still have considerable impact on the surrounding area. Additionally,

## Responses

### 13-1

Refer to comment 10-6.

### 13-2

In response to this and other public comments the Calle de la Plata route has been adjusted 1000 feet to the south. The adjustment will avoid the Petroglyphs within Griffith Canyon.

### 13-3

In response to this and other public comments, the Calle de la Plata route has been adjusted to avoid impacts to the viewshed from Reno Sparks Indian Colony in Hungry Valley.



## Comments

## Responses

13-3  
cont'd

revegetation efforts for past projects (most noticeable the Tuscarora Pipeline) have proven themselves inadequate at best. Again, this conflicts with RSIC's planning policies for the valley, and at this point, no adequate mitigation has been proposed.

13-4

- EIS does not adequately consider future development. Throughout the EIS process, RSIC and others have noted that this transmission line will create a corridor suitable for future utility development. However, the EIS has not addressed the types of utilities that would be suitable for placement within this corridor, and RSIC has to consider that future development of some type will be likely. This project must be measured by us not only as a single project, but also as a precedent that will provide an opportunity for future uses to further compromise the valley's integrity and cause further conflicts with our planning policies.

13-5

Tribal Council did not recommend a specific alternative for a preferred route, and recognizes that any other route will not have a direct effect on RSIC's interests. The agencies and communities through which the routes will run are best suited to recognize and protect their interests.

13-6

RSIC also recognizes that among the governments acting as cooperating agencies, we are the only one that does not have permitting authority over this project. However, BLM does have a trust responsibility to Indian tribes, including RSIC, and has an obligation to consider and protect our interests.

RSIC does thank BLM and the other cooperating agencies for including us in the EIS process, and for maintaining a dialogue through which our concerns have been voiced. We look forward to continuing our relationship and hope that you consider our recommendations and uphold your trust obligation to us through the conclusion of this process.

Thank you,



Arlan D. Melendez, Chairman  
Reno-Sparks Indian Colony

13-4

The Cumulative Impacts section considers the possibility of future utility development along the selected route.

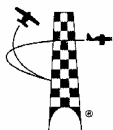
13-5

Comment noted.

13-6

Refer to response 10-44.

Letter  
14



# NATIONAL CHAMPIONSHIP AIR RACES®

RENO AIR RACING ASSOCIATION, INC.

Michael J. Houghton, President and CEO  
Reno Air Racing Association

2004

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Jack Walther, DVM  
Dan Watkins

14-1

December 10, 2003

Ms. Terri Knutson  
Planning and Environmental Coordinator  
Bureau of Land Management  
Carson City Field Office  
5665 Morgan Hill Road  
Carson City, NV 89701

2003 DEC 12 AM 10:23  
RECEIVED  
BUREAU OF LAND MGMT  
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VIA Federal Express #836353723016

Dear Ms. Knutson:

This will serve as the official public record submission on behalf of the Reno Air Racing Association (RARA) regarding our position on the proposed western route of the Tracy power line.

We stand, as an organization, against the proposed above-ground route along the western boundary of the Reno Stead Airport. This proposed route would serve as a hazard to the Air Races, and would impact the safety of pilots and the future of the Reno Air Races.

The Reno Air Races have been operating from Stead Airport since 1966 and have installed 5 closed pylon race courses. When racing, the aircraft will race at altitudes of between 200 feet and 40 feet above the ground. Over the years, these race courses have been modified to accommodate safety concerns regarding the development of property around the Airport. The courses have also been modified to insure the safety of the pilots, participants and the fans and to insure a safe egress from the race course in the event of an emergency situation. Our focus has always been on the safe operation of the Races and the erection of a power line in this area would be unsafe.

September 16-19, 2004

P.O. Box 1429 • Reno, Nevada 89505 • (775) 972-6663 • FAX (775) 972-6429 • www.airrace.org

## Responses

14-1

Comment noted- All six alternatives (excluding the No Action Alternative) were developed from public input during the scoping process. Each alternative has been deemed a viable alternative and therefore must be included in the final EIS. The final selected route will take into account community concerns such as socioeconomics and aircraft safety.

## Comments

## Responses

We have been engaged in discussions with the Federal Aviation Administration (FAA) at several levels and all of have assured us that should the power line be erected, the FAA waivers, necessary for the operation of the Reno Air Races would be **withheld** by all parties at the FAA (letter attached). This would result in the Races not being "licensed" to operate at Stead.

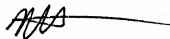
The proposed route most dramatically impacts the Unlimited race course as it encroaches into the safety radius egress path at pylon 6. It also impacts the western edge and safe operation of every race course.

14-2

The Reno Air Races are conducted under the issuance of an operating waiver granted by the FAA. Without that waiver, the Reno Air Races could not operate at Stead Airport, resulting in the annual loss of over \$55 million in economic impact to the Reno/Sparks community. We therefore request that alternate plans be made to place the line underground or be erected via another route.

Should you be in need of any additional information, please contact me.

Sincerely,



Michael J. Houghton  
President and CEO

14-3

Attachment

MJH:ew

cc: Reno Air Racing Association Board of Directors  
Krys T. Bart, Executive Director, Airport Authority of Washoe County  
Shaun Carey, City Manager, City of Sparks  
Bob Cashell, Mayor, City of Reno  
Jeff Ceccarelli, Sierra Pacific Power Company  
Kenny Guinn, Governor, State of Nevada  
Charles McNeely, City Manager, City of Reno  
Skip Polak, Manager, Reno Stead Airport  
Katie Singlaub, Manager, Washoe County  
Mike Smart, Sierra Pacific Power Company

14-2

Refer to response 2-1.

14-3

The Attachment is the same as Letter 2-1. Refer to response 2-1.

## Comments

## Responses

Letter  
15

### Red Rock Estates

Property Owners Association

*Board of Directors*

April 7, 2003

Ms. Terri Knudsen, EIS/EA Project Manager  
BUREAU OF LAND MANAGEMENT  
5665 Morgan Mill Road  
Carson City, NV 89701

Dear Ms. Knudsen:

15-1

This letter is to oppose Sierra Pacific Power Company's proposed 120KV electrical transmission line from Tracy to Silver Lake along any route within the Red Rock Estates Property Owners Association. A recent survey of our 650 property owners reveals that not one member of this Association supports any proposed route within Red Rock Estates. Indeed, there is unanimous consensus from our membership to oppose.

15-1

Comment noted.

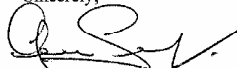
15-2

The preferred route of the Association, as well as by others in the North Valleys, is the Southern Route. We urge the Bureau of Land Management and Sierra Pacific to adopt a route that has the least impact on private and public lands and one that takes into account visual, environmental, economic and social impacts, and one that takes advantage of existing utility corridors as delineated in the area's Regional Utility Corridor and master plans.

15-2

Comment noted.

Sincerely,



Gene Savoy, Jr.  
President

Cc: Sierra Pacific Power Co.  
Commissioner Bonnie Weber

P.O. Box 3707, Reno, Nevada 89505

## Comments

## Responses

### Letter 16

SAMUEL S. LIONEL  
GRANT SAWYER  
(888-8888)  
JON R. COLLINS  
(920-1987)  
RICHARD H. BRYAN  
JEFFREY P. ZUCKER  
PAUL R. HEJMANOWSKI  
ROBERT D. FAISS  
DAVID N. FREDERICK  
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DAVID WHITEMORE  
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ALLEN J. WILT  
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RORY J. REID  
DAN C. MCGUIRE  
LESLIE BRYAN HART

OF COUNSEL  
BRIAN HENRY  
ELLEN WHITEMORE  
BRIAN HARRIS  
ABBIE G. FRIEDMAN

### LIONEL SAWYER & COLLINS

ATTORNEYS AT LAW  
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50 WEST LIBERTY STREET  
RENO, NEVADA 89501  
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December 15, 2003

JEFFREY D. MENICUCCI  
CRAIG E. ETEM  
TODD E. KENNEDY  
LAURA J. THALACKER  
SHAWN M. ELICEGUI  
VICTOR J. CARBAJAL II  
EMILIA K. CARDILL  
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G. LANCE COBURN  
WILLIAM J. MCNICAM  
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ERIC C. BOUGHMAN  
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JENNIFER ROBERTS  
SUZANNE L. KRAMER\*

\*ADMITTED IN CALIFORNIA ONLY

WRITER'S DIRECT DIAL NUMBER:  
788-8602

### VIA FACSIMILE, ELECTRONIC & U.S. MAIL

Ms. Terri Knutson, Planner  
United States Department of the Interior  
Bureau of Land Management  
Carson City Field Office  
5565 Morgan Mill Road  
Carson City, Nevada 89701

RECEIVED  
BUREAU OF LAND  
MANAGEMENT  
CARSON CITY  
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DEC 16 A 11:28

### Re: TRACY-SILVER LAKE TRANSMISSION LINE PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENTS

Dear Ms. Knutson,

We represent the Red Rock Estates Property Owners Association ("RRPOA") and, on behalf of the RRPOA file the following comments on the Tracy-Silver Lake Transmission Line Project Draft Environmental Impact Statement (the "DEIS").

To summarize, the RRPOA's comments raise issues including but not limited to: (i) the inadequacy of analysis addressing major impacts under the Regional Utility Corridor Report; (ii) improper reliance on incomplete economic considerations; (iii) inconsistencies with the North Valleys Area Plan/ Washoe County Comprehensive Plan; (iv) inconsistencies with the Red Rock Estates CC&R's; (v) inadequate mitigation evaluation and commitment; (vi) impact on property values; (v) the DEIS' failure to comply with the Regional Utility Corridor Report by analyzing the Existing Corridor as a preferred alternative; (vi) specific impacts to property owners in the Red Rock Estates; and (vii) inadequate identification of the need for a transmission line and substation in the North Valleys area. Indeed, as discussed below, the Washoe County Department of Community Development Staff also opposes the Northern Alternative, raising concerns of a transmission

## Comments

## Responses

LIONEL SAWYER & COLLINS  
ATTORNEYS AT LAW

Knutson, Terri  
December 15, 2003  
Page 2 of 11

corridor “down the heart of Antelope Valley, a rural residential community” that presently has no requirement for 120kV electrical service “nor will it in the future and presently has no existing transmission lines within the valley.”

### A. Major Impact Under Regional Utility Corridor Report

Policy 2.3.6.5 of the Regional Utility Corridor Report requires that the location of new overhead utilities, residential developments, schools, daycare facilities and healthcare facilities (collectively “qualifying structures”) be such that the separation between occupied or inhabited structures and overhead utilities located in either existing or new corridors shall be a distance of at least 150 feet between a transmission line centerline for a 120kV overhead utility and the location of qualifying structures.<sup>1</sup> The DEIS reports the number of qualifying structures that would be within this distance for each alternative. The document, however, does not provide an inventory of the character of the structures and, thus, fails to adequately evaluate the environmental impacts and necessary measures to mitigate such impacts.

16-1

An environmental impact statement must be sufficiently detailed to aid decision-makers in deciding to proceed and to provide information the public needs to enable both those who would challenge and those who would support the project to respond effectively.<sup>2</sup> It could make a significant difference in comparing alternatives if some qualifying structures within 150 feet of the transmission line centerline are schools and daycare facilities compared to others that are uninhabited or limited-purpose structures. Indeed, the DEIS itself notes that a number of the structures *might be* uninhabited and, thus, recognizes the importance of the character of these structures in evaluating environmental impacts. It is important to understand the character of these structures in order to comment on the form of proposed mitigation and analyze the effectiveness of such proposed mitigation. This information is critical to a meaningful comparison of the different alternatives.

### B. Improper Reliance on Incomplete Economic Considerations

16-2

Table 2-3 of the DEIS provides a comparison of the approximate transmission line cost for the proposed action and each of the alternatives. In addition, a comparison of the cost associated with each alternative is provided in the Socioeconomics and Environmental Justice Section of Chapter Four. The DEIS does not include the cost of obtaining right-of-ways, permitting, acquiring

<sup>1</sup> Policy 2.3.6.5, Regional Utility Corridor Report to the Truckee Meadows Regional Planning Governing Board: Proposed New Policies and Guidelines for Inclusion in the Truckee Meadows Regional Plan Pertaining to the Development of Utility Corridors in the Truckee Meadows 1, 14 (1999) (hereinafter the “Regional Utility Corridor Report”).

<sup>2</sup> Trout Unlimited v. Morton, 509 F.2d 1276, 1285 (9th Cir. 1974).

16-1

The DEIS provides the most conservative analysis of structures within 150 feet from the transmission line centerline. The ROD will identify mitigation measures that will be implemented.

16-2

Refer to response 11-23.

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property or other "extraneous requirements." Therefore, the "cost" of each alternative reported in the DEIS is misleading as those numbers could vary dramatically depending on these "extraneous requirements." The National Environmental Protection Act ("NEPA") requires a "finely-tuned systematic balancing analysis" of the environmental impacts and economic costs and/or benefits.<sup>3</sup> Although no formal cost benefit analysis is required, the DEIS should reflect a comparison of potential benefits and potential adverse impacts.<sup>4</sup> In this regard, a DEIS must give readers and decision-makers enough detail concerning ecological and economic consequences to permit reasoned evaluation.<sup>5</sup>

16-3

Similarly, the Regional Utility Corridor Report emphasizes that while cost is a factor for consideration it should be *carefully weighed* against the societal benefit gained from directing utility corridor development into locations the community desires. One thing was clear from comments at all Citizens Advisory Board meetings where the DEIS was presented: the community desires that the transmission line be constructed in the existing corridor. The only comments adverse to the Existing Corridor Alternative were concerns of the increased cost for that alternative and how it would affect rates for residential ratepayers. This concern highlights the importance of including a complete and reasoned analysis to enable the public to effectively respond to the DEIS.

16-4

In this regard, it is important to note that people at the Citizen Advisory Board meetings on the DEIS raised concerns about rate increases based on representations by the utility that use of certain corridors and undergrounding transmission lines would significantly increase construction costs. In fact, no rates can be increased without approval from the Public Utilities Commission of Nevada and that agency's finding that investments directly benefit ratepayers and are prudent. Accordingly, this should not be used as a scare tactic to detour members of the public from advocating for use of certain corridors and undergrounding transmission lines. Indeed, the very topic of what representations were made by the utility as evidence previously presented to the PUCN to get rate increases or other regulatory approvals will determine whether or not the public sees any rate increase.<sup>6</sup>

16-5

The DEIS fails to adequately analyze or compare the cost differential for constructing the facilities underground or overhead with concerns for quality of life, visual impact, public safety, reliability and property value impacts. The RRPOA understands, based on a 1999 report prepared

<sup>3</sup> State of California v. Bergland, 483 F.Supp. 465, 482 (E.D. Cal. 1980).

<sup>4</sup> 42 U.S.C. § 4332(2)(B); 40 C.F.R. 1500-1508; State of California v. Block, 690 F.2d 753 (9th Cir. 1982).

<sup>5</sup> South La. Environmental Council, Inc. v. Sand, 629 F.2d 1005, 1013 (5th Cir. 1980).

<sup>6</sup> See infra §1 (discussing the utility's previous representations regarding the Alturas Transmission Line Project).

16-3

Per RUCR the decision makers will assess the tradeoffs of the project. The basis for their decision will be documented in the Record of Decision.

16-4

Per the input received from the CABs and during the scoping process, the Existing Corridor Alternative was added and analyzed as a viable option. We concur that any rate adjustments must go through the PUC.

16-5

As discussed in Chapter 2 of the EIS, based upon the third party analysis of construction line costs, undergrounding would be approximately 1.69 million dollars per mile. Because rate increases have to go through the PUC, it cannot be forecasted as to what the actual change in homeowner bills would be. The actual change in each homeowner bill would not be proportional to the difference between overhead and underground line costs.

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by EnergySource in Reno, Nevada, that the net result of the differential cost for underground construction at 120kV, to the average homeowner's bill, for a mile of underground installation would be approximately \$.02 per month. This estimate is substantially different from impressions of persons at the CAB meetings that if undergrounding would cost seven times more than constructing overhead lines, their utility bill would increase by a magnitude of seven times the current charges. Neither Sierra Pacific Power Company nor Ms. Knutson corrected citizens who expressed this as their understanding of the potential impact on ratepayers.

16-6

The cost of each alternative could vary dramatically depending on the character of the qualifying structures impacted by the proposed transmission line. General mitigation for this impact as described in the document could include placing the transmission line underground rather than overhead, or even purchasing the qualifying structure. Obviously, to provide any realistic comparison of the cost of the different alternatives, these economics also must be considered. Indeed, Sierra Pacific Power Company, in its 2002 Progress Report on its 2001-2020 Resource Plan, characterized private land easement acquisitions as a major expense with regard to the Falcon-Gonder transmission project. Yet, no estimates of such acquisition costs are provided in the DEIS. While obtaining appraisals for properties necessary to each alternative arguably could be burdensome at this point, general background data and some general estimate based on the utility's experience should be considered in the analysis. Another important factor in any cost benefit analysis is the increased expense and impact from the potential for overhead power lines to start fires, compared to underground lines.

16-7

Finally, it was disclosed at the Spanish Springs Citizens Advisory Board meeting that Sierra Pacific Power Company has proposed an "informal alternative" to the City of Sparks to underground existing power lines and proposed 120 kV power lines along La Posada Drive in Sparks, Nevada. This proposal apparently seeks to mitigate noncompliance of the proposed transmission line with the Sparks Master Plan that states that utility lines should be constructed underground. Although the DEIS need not explore endless or speculative construction alternatives, it should disclose identified potential mitigation measures, such as this proposal as information necessary to adequately inform the public to enable effective response to the document.

Therefore, the costs of each alternative reported in the document are at best meaningless and at worst misleading. Either way, the document does not comply with the requirements of NEPA.

### C. Inconsistencies with North Valleys Area Plan/ Washoe County Comprehensive Plan

16-8

The DEIS is inconsistent with the North Valleys Area Plan which constitutes part of the Washoe County Comprehensive Plan. It is a policy of the North Valley Area Plan that in order to preserve the natural setting of the area, utilities such as electrical lines should be placed underground. The DEIS does not evaluate the potential for placing the transmission line in the

16-6

Refer to response 11-23.

16-7

Refer to response 11-20. Placing a monetary value on uncertain circumstances would be speculative.

16-8

As a cooperating agency, Washoe County is responsible for determining conformance of the DEIS with the County Plans. The analysis in the DEIS is consistent and in conformance with the Washoe County Comprehensive Plan. In addition, other alternatives and mitigation measures as described in the Draft EIS can or may resolve the impacts.



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North Valley Area underground.<sup>7</sup>

16-9

As discussed herein, the installation of utility lines overhead in this area creates a significant impact on a pristine visual resource. Accordingly, the RRPOA requests that utility lines in this area be placed underground. In this regard, the analysis of and proposed mitigation for the visual impact of the proposed transmission line simply is inadequate. As indicated by the Washoe County Department of Community Development Staff with regard to the Northern Alternative, "it serves no ones purposes to construct a transmission corridor down the heart of the Antelope Valley, a rural residential community that presently has no requirement for 120kV electrical service nor will it in the future and presently has no existing transmission lines in the valley."<sup>8</sup>

16-10

The RRPOA also questions the need for the Stead Substation and the 120kV transmission line in the North Valleys area.

### D. Inconsistent with Red Rock Estates CC&R's

16-11

The Red Rock Estates CC&R's requires undergrounding of all utilities on property within the Red Rock Estates. The DEIS neither provides for such undergrounding nor recognizes the inconsistency of proposed overhead utilities with these CC&R's. The RRPOA requests that consistent with the Red Rock Estates CC&R's, all utility lines within the Red Rock Estates be placed underground. In addition, to the extent that all utility lines are not placed underground in the North Valleys area, the RRPOA requests that at a minimum, utility lines within one mile of the outside boundary of the Red Rock Estates be placed underground.

### E. Inadequate Mitigation Evaluation & Commitment

16-12

The DEIS recognizes that blasting during construction could damage springs and wells affecting flow and production rates. Although several hundred water wells are identified within a half mile of the transmission line under each alternative, the DEIS only states that implementing Best Management Practices and recommended mitigation would reduce the possible impact on wells and springs. This conclusion provides no analysis as to how and to what level the mitigation would reduce the possible impact. Furthermore, the document does not commit or require Sierra Pacific Power Company to complete any such mitigation rather, it only states in a conclusory manner that

<sup>7</sup> The DEIS lists undergrounding as potential mitigation, however, it does not analyze or evaluate the effectiveness of such mitigation, provide specific locations where it would be implemented or, commit to such mitigation in any instance. Mere listing of potential mitigation is insufficient to qualify as reasoned discussion required in an EIS.

<sup>8</sup> Memorandum From Bill Whitney and Trevor Lloyd, Washoe County Department of Community Development to Bureau of Land Management and Cooperating Agencies (February 19, 2003), at 1.

## Responses

16-9

Comment noted.

16-10

Comment noted.

16-11

Comment noted.

16-12

Residual impacts to water resources after mitigation are provided in the DEIS page 4-18. The ROD will document which mitigation measures will be implemented.

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doing so would reduce possible impact.

16-13

Similarly, the DEIS states that a potential residual adverse effect on the aesthetics of an area could result from the structure used for connecting aboveground lines with underground lines and that use of this structure at both ends of a line segment placed underground could have visual impacts more adverse than not placing a line segment underground. This is an inadequate evaluation. There is no comparison or analysis of this impact. For example, how frequently would the need arise for these structures? Where would they be placed? Are there alternatives to the use of such structures if utilities are placed underground?

16-14

In numerous instances, proposed mitigation in the DEIS is described as optional. For example, mitigation for aesthetic impacts from the proposed Reno-Stead Airport Substation include a number of speculative measures. The fencing materials, equipment and structures within the substation would be nonreflective, *where possible*. Similarly, *where feasible*, equipment would be painted a BLM-approved color to blend in with predominant vegetation and soil types. Existing vegetation outside of the proposed substation site and access road location would be preserved *to the extent possible*. No analysis is provided as to how the determinations are made as to what is "possible or feasible" or whether the conclusion that there would be minor impacts on the aesthetic quality of the surrounding area would change if these measures were not taken.

16-15

Finally, under the Cultural Section, no analysis is provided for the Native American Religious Concerns under the Calle de la Plata Alternative. In addition, under this same section, mitigation and monitoring requirements include that in the event any cultural resources that may qualify as National Register of Historic Preservation-eligible prehistoric or historic properties are discovered during project construction, potentially destructive construction work in the vicinity of the find would be stopped immediately. The DEIS, however, does not provide for any training or supervision of construction personnel to qualify them to recognize such cultural resources. This mitigation is meaningless without provision for qualified personnel at the construction site to identify such cultural resources and prevent their unknowing destruction.

### F. Impact On Property Values

16-16

The DEIS recognizes that negative impacts on property values can result from views toward a power line and from the uncertainty of power line-related health hazards. For property adjacent to the proposed action, where no easement acquisition is required, property values could decrease and would not be offset by the appraisal process for easement acquisition. The DEIS does not require or commit to provision of mitigation for this impact. Rather, the DEIS merely states that assessing the actual diminution in property value would require a formal appraisal or property value study thus demonstrating that this impact has not been evaluated in the document. Alternatively, the EIS states that undergrounding the power line in this area *could* mitigate potential impacts on property values. The document does not require SPPCo to complete any mitigation for this impact

## Responses

16-13

Photos have been added to show the visual difference between an underground transition structure and a overhead transmission line pole. Refer to Figure 4-1 for potential underground mitigation locations. Transition structures would be required at both ends of the undergrounding sections. Mitigation measures that will be implemented will be identified in the Record of Decision.

16-14

Chapter 1 has been revised to delete "where feasible". Mitigation measures that will be implemented will be identified in the Record of Decision.

16-15

The Calle de la Plata Alternative has been added. Refer to response 9-1.

16-16

A Draft EIS presents potential mitigation, but does not require or commit an applicant of a project to implementation. Mitigation is finalized in the Record of Decision. Costs for land acquisition has been added to table 2-3 and Chapter 4 under the "Socioeconomics and Environmental Justice" section.

Text has been added to Chapter 4 in the "Socioeconomics and Environmental Justice" section to state, "Properties adjacent to the proposed action or alternatives that do not require easement acquisition could have a perceived indirect impact; however, this impact is based on personal preference and is not quantifiable."

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or even evaluate or quantify this impact. Again, this exemplifies that the purported "costs" for each alternative omit a number of directly relevant economic considerations. Similarly, mitigation under the Socioeconomic and Environmental Justice Section merely states that measures such as screening or placing a proposed power line underground, *could* mitigate visual impacts on property value. The document provides no evaluation or assessment of the severity of the impact on property values or to what level such impact will be mitigated by mandatory measures.

### G. The Existing Corridor Alternative Should Be The Preferred Alternative<sup>9</sup>

The Regional Utilities Corridor Report is intended to (i) ensure that areas or aspects of community value are avoided or sufficiently separated from the potential adverse impact of proposed infrastructure; (ii) encourage the use of existing utility corridors; and, (iii) minimize the establishment or creation of new corridors.<sup>10</sup> The Regional Utilities Corridor Report prescribes the standards, procedures and tools local governments must use in evaluating and conditioning proposed utility projects.<sup>11</sup> Accordingly, local agencies with discretionary or administrative review of development applications bear the responsibility to maintain and manage utility corridors and adjacent lands consistent with the policies and guidelines outlined in the Regional Utility Corridor Report.<sup>12</sup> These policies emphasize the use of existing utility corridors and sites over the establishment of new corridors: "When locating new electric utilities and/or facilities, or wireless communication sites, *maximum effort shall be made to utilize existing utility corridors*..."<sup>13</sup> The Existing Corridor provides the highest degree of compliance with the visual policies of the Regional Utility Corridor Report.

The DEIS recognizes that portions of all the other alternatives may involve establishing a new utility corridor which could result in the future use of the new corridor by other utilities which, in turn, could place structures within the corridor that could adversely affect visual resources. The future impacts could be severe demonstrating yet another significant advantage of the Existing Corridor Alternative. The Regional Utility Corridor Report also requires that in the objective review of alternatives, preference be given to alternatives that clearly show consistency with the regional

<sup>9</sup> Although the DEIS emphasizes that the Existing Corridor Alternative is the most expensive and the least reliable with the most double circuiting of all the alternatives, it was reliable enough to be considered a technically feasible alternative to reasonably achieve the purpose.

<sup>10</sup> Regional Utility Corridor Report, at 1 & 4.

<sup>11</sup> Id. at 4.

<sup>12</sup> Id. at 6.

<sup>13</sup> Id. at 13 (emphasis added).

16-17

The Existing Corridor Alternative was evaluated to comply with the requirements of RUCR. The decision to determine the preferred alternative will be made by the BLM and the cooperating agencies.

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16-18

planning policies and guidelines. One of those guidelines prescribes prioritizing the use of existing corridor resources. Furthermore, under the Regional Utility Corridor Report, in order to secure approval to establish new corridors, it must be demonstrated that the use of an established corridor is not in the best interests of the community participants. The DEIS does not include this analysis. Finally, the Regional Utilities Corridor Report requires identification of impacts from a new corridor that is fully built-out. The DEIS does not provide analysis or considerations to adequately inform the public and decision-making agency of the impacts of establishing a new utility corridor.

16-19

The Existing Corridor Alternative results in the least impact on public and private lands: 92% of the transmission line would be located along existing corridor; only 491 water wells are identified within a half mile of the transmission line, compared to 753 for the Proposed Alternative and 782 for the Calle de la Plata Alternative.

16-20

Under the Southern Washoe County Urban Interface Plan Amendment, new overhead electrical transmission facilities and corridors of 60 kV or greater proposed on public lands will be discouraged in favor of using existing corridors, routing on private land or undergrounding in visually sensitive areas. Natural, visual and cultural resources important to the community are to be major considerations in analyzing utility proposals. The Existing Corridor provides for the greatest compliance with this policy as 87 percent of the ROW would be on private land and, thus, only 13 percent would be on public land.

### H. Specific Impacts To Property Owners In The Red Rock Estates

The proposed Northern Route would enter Antelope Valley on Destiny Court, then continue on to the intersection of Red Rock Road. Antelope Valley also is recognized as a portion of 654 deed restricted parcels located within Red Rock Estates Property Owners Association. Based on the information provided in the DEIS the RRPOA believes the following impacts could occur:

16-21

- (1) 41 parcels would suffer an immediate loss of approximately 1 acre of land;
- (2) 82 parcels within 100 feet of the proposed project would sustain visual impacts, loss of property value, unknown health risks from EMF's and a potential threat to their livestock/ranch businesses which continues to "preserve our western heritage" (as defined and referenced in the Truckee Meadows Regional Plan as Development Constraint Areas (DCA), Rural Development Area (RDA), and Open Space). As mitigated, slopes over Fred's Mountain would be greater than 15 percent while no specific "slope management" or erosion control is discussed;

16-22

- (3) There are 35 structures withing 150 feet of the proposed transmission line, which include 12 working ranches. Washoe County quoted over 100 recognized licensed business owners in the Red Rock Estates alone, most relative to the agricultural industry.

## Responses

16-18

The proposed action is to establish a transmission line route and not a designated utility corridor. The DEIS incorporates RUCR guidance.

The NEPA process is a public disclosure solicitation process.

Public input from scoping and the review of the DEIS helps decision makers make this determination.

16-19

Impacts from a new corridor are discussed as a potential cumulative impact in Chapter 4.

16-20

Comment noted.

16-21

Comment noted.

16-22

As discussed in chapter 4 mitigation monitoring measures are as follows:

"Construction activities on slopes greater than 15 percent would be required to comply with the Washoe County hillside development ordinance provisions for developing, preserving, and protecting hillsides and ridgelines, and fill slopes should not exceed a maximum ratio of 3:1."

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The Proposed Route and Calle de la Plata Route would travel through approximately 9 parcels to varying degrees along the western side of American Flat and Boron Lane. Accordingly, 9 parcels would be directly impacted as the proposed line would traverse through the middle or a portion of each parcel thus destroying pristine mountain and valley views. This route would travel over slopes greater than 15 to 30 percent, yet no specific reference in the DEIS was made to slope management or specific erosion control in this area. This also would result in the approximate loss of 1 acre per parcel and in some cases the potential loss of an entire parcel in order to meet the requirements of the proposed project. In addition, 14 parcels which are within 100 feet of the proposed route would most likely see a loss of property, property value, views and potential unknown health risks from exposure to EMF's.

**16-23** | It is difficult to determine from the information provided in the DEIS precisely where this proposed line would be placed and how many additional properties would be affected. It is the RRPOA's opinion, to summarize, that approximately 82 properties in the Fred's Valley/Matterhorn Range area or 220 in Antelope Valley/Fred's Mountain pass area would be affected if the construction of these routes were to occur.

### **I. Other Concerns To Be Addressed**

**16-24** | The DEIS fails to adequately identify a need for the transmission line and accompanying proposed substation in the North Valleys area in light of significant impacts the transmission line would impose on residents of the Red Rock Estates and the Antelope Valley. As indicated by Washoe County during the scoping process, it "serves no ones purposes to construct a transmission corridor down the heart of Antelope Valley, a rural residential community that presently has no requirement for 120kV electrical service nor will it in the future and presently has no existing transmission lines within the valley."

**16-25** | In addition, during public meetings on the DEIS, it was raised that the utility justified a previous project, the Alturas Plan, in part based on representations that a 345/120 kV transformer at Bordertown combined with 120kV transmission to integrate the new source in the existing system *should result in the elimination of the planned 1999 addition of a second North Valley Road 345/120 kV transformer*. Please explain how this representation is consistent with the proposed Tracy-Silver Lake Transmission Line Project.

**16-26** | As noted in Table 1-2 of the DEIS, it was requested during the scoping process for the DEIS that the document address what benefit this project would be to North Valley residents. The table references this issue as being addressed in Chapter 1. Please identify with specificity, the page and language in Chapter 1 addressing this issue.

**16-27** | Other scoping comments included requests that the DEIS evaluate (i) potential risks to public safety from downed power lines restricting access/egress, especially along LaPosada, which is the

## Responses

**16-23**

Comment noted.

**16-24**

The Reno-Stead Airport Substation is needed to support the future developments planned in the area by the Airport Authority of Washoe County. Refer to Chapter 1, Purpose and Need.

**16-25**

Refer to Response 11-4.

**16-26**

In Chapter 1, under the "Purpose of and Need for the Proposed Action" the benefits of the project are identified. Text has been revised to clarify that the Stead area is meant to include the North Valley residents.

**16-27**

The public safety issue described in this paragraph is not significant. There are other roads or access that parallel La Posada and could be used to access this area. Also as discussed in Chapter 4, "a particular public safety issue that was raised involves La Posada. The Proposed Action would place transmission lines on the southern side of the west-east trending La Posada; the eastern end of La Posada is a dead end. If a utility pole falls northward across La Posada, residents and emergency services would have difficulty accessing or leaving the area east of the fallen utility pole. This is not expected to be a major impact, because the project would be replacing utility poles and lines that are already along the southern side of La Posada; therefore, there would be no change to the existing environment. Also, the land to the north of La Posada is undeveloped and relatively flat and could be used by vehicles to drive off-road and around a fallen utility pole. Furthermore, SPPCo's construction, operation, and maintenance plan, as discussed above, would identify procedures to follow to protect access past construction and maintenance activities along La Posada."

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16-28

only access/egress road for residents in the area; and, (ii) potential conflicts with local master plans or general plans, including requirements for underground construction in the North Valleys Area Plan and encouragement of underground construction in the Sparks Master Plan. Table 1-2 of the DEIS states that these issues are addressed in Chapters 4 and 1, respectively. We did not find specific or adequate evaluation of either of these issues in the document. Please identify with specificity, the page and language in the DEIS addressing these issues.

16-29

In addition, it was questioned during the scoping process whether the project should be delayed until Sierra Pacific Power Company's Master Plan for the areas has been completed. The DEIS states that this issue is addressed in Chapter 2, yet we did not identify analysis in that chapter responsive to this issue. Please advise where in Chapter 2 this analysis is provided. Moreover, please provide analysis regarding compliance with long range corridor planning under Section 3.3.2 of the Regional Utility Corridor Report requiring that utilities using existing corridors and establishing new utility corridors provide a 10 or 20 year resource and facility plan of utility infrastructure development in order to identify how existing corridors might be used or expanded and when new corridors might be sought.<sup>14</sup> Finally, it also was requested during scoping that the document consider whether new power lines are development generated and, therefore, the cost should be borne by the developers and passed on to purchasers of new development. Again, Table 1-2 references Chapter 2 as responsive to this issue, yet we could not locate such an evaluation. Please explain where in Chapter 2 this discussion occurs.

16-31

Finally, the RRPOA feels compelled to raise what it sees as a potentially serious process issue. It was apparent from statements of a member of the Spanish Springs Citizens Advisory Board that she wanted to make fairly extensive comments but had been prevailed upon by the Bureau of Land Management ("BLM") not to make those comments. If accurate it would appear BLM is attempting to limit the public dialogue on the DEIS. Evidence of that fact is in the record. Specifically, Ms. Knutson represented to the CAB and the audience at the Spanish Springs CAB meeting that BLM was not there to "debate the alternatives" rather simply was there seeking deficiencies in the document. We consider this an inappropriate comment from the BLM that perhaps adversely affected the public hearing process by discouraging public comments. While the particular CAB member and other individuals may submit their comments to you in writing, other members of the public may have benefitted from discussion at the public hearing that was suppressed by the comment. In addition, there simply is no requirement that members of the public

<sup>14</sup> Id. at 17.

## Responses

16-28

The following has been added to the Chapter 3 paragraph before the "Land Use-Proposed Action" section: "The North Valleys, Spanish Springs, Sun Valley, and Truckee Canyon Area Plans, state that utilities such as electrical lines should be placed underground. The Warm Springs Area Plan states that electrical lines should be placed underground to the maximum practicable extent possible (Washoe County 2003a)."

16-29

See Chapter 1, Project History. The FEIS includes this corrected reference.

16-30

Refer to response 14-17.

16-31

The Public Utility Commission of Nevada through its rules and regulations determines the cost allocation of new infrastructure. The following text has been added to Chapter 2: "Electric rate structures are determined by Public Utility Commission of Nevada." Refer to response 14-5.

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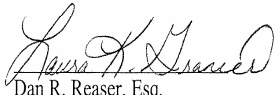
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put their comments in writing rather than voice them at a public meeting. Requiring unrepresented lay persons to do this is a means of limiting the public dialogue and, indeed, may eliminate comments.

Should you have any questions, or require additional information please advise.

Sincerely,



Dan R. Reaser, Esq.

Laura K. Granier, Esq.

Attorneys for the Red Rock Estates Property Owners  
Association

## Responses

## Comments

**Letter** BLM Carson City Field Office  
**17** Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

Sent by email to:  
[Tknutson@nv.blm.gov](mailto:Tknutson@nv.blm.gov)

December 12, 2003

Re: Comments on proposed Tracy to Silver Lake Power Line  
Draft Environmental Impact Statement

The analysis documented in this draft EIS lacks refinement and detail. No specific service area for the proposed power line is identified, no specific customer demand is identified and social and economic data is so broad in nature as to render it useless for this analysis. This results in a document that looks more like an attempt to barely meet a regulatory requirement than a true attempt to present facts to assist in decision making. More specific comments follow:

### INTRODUCTION

#### Purpose and Need for Proposed Action

**17-1** The document states that the need for the Proposed Action is to accommodate normal and projected demands and to avoid loss of service and that without immediate system improvements, the system is likely to experience sustained overloads. There are no figures on growth projections, land use planning (planned or permitted housing units), property ownership (residential and commercial), and no geographic service area identification to support these statements. This takes away from the usefulness of the document since the purpose for the proposal is unsupported.

**17-2** The second paragraph on page 1-4 identifies the need for a substation, stating that substations are generally located in the central part of a service area, and further stating that a variety of factors, including growth projections, land use planning, property ownership and transmission line routing were taken into account in developing a proposed location, with an alternative location, for this substation. The document does not contain any figures relating to these "factors" such as growth projections, planned or permitted housing, or property ownership, and no service area is identified.

**17-3** The third paragraph on page 1-4 states that SPPCo identified a lack of capacity to accommodate long-term growth and adequate contingency reliability in the electrical system supplying power to the Stead area, but fails to identify a source document or to cite any reference material.

This section of the document goes on to state that the proposed 120 kv extension would fortify the system with adequate capacity to accommodate anticipated demand and to insure system reliability. No facts or figures are provided on current or anticipated demand and no service area is identified. The geographic location and extent of such

## Responses

### 17-1

As discussed in Chapter 1, Project History, public input requested that this EIS include all connected actions, whether for immediate or future implementation. In addition, Chapter 1 states: "The proposed 120 kV extension from the proposed Sugarloaf Substation (south of Sparks) to the Silver Lake Substation (in the Stead area) would fortify the system by providing a power connection to the area that has adequate capacity to accommodate prevailing and anticipated demand in the area and to improve system reliability for contingency situations." In addition, the Airport Authority of Washoe County identified future growth in their master plan and the ECI report used land use planning as part of their forecast for load demand (refer to Chapter 1, "Relationship to BLM and Non-BLM Policies, Plans, and Programs"). Cooperating agencies played an integral role in development of the DEIS.



## Comments

- 17-3 cont'd** demand is the justification for this proposed power line. Without such justification, there is no purpose and need.
- 17-4** This section, as referenced earlier in these comments, states that substations are generally located in the central part of a service area. No proposed service area is identified for the proposed Reno-Stead Airport Substation, and no customer load projection is listed. The total justification in the document seems to be a statement that the Substation is needed to support future developments planned by the Airport Authority of Washoe County. Table 4-31 of the draft states that no specific time line is developed for this plan. Since no specifics are referenced, this amounts to no justification at all for this Substation. This is inadequate in terms of NEPA requirements and mocks the process.
- The accumulation of mistakes, errors and omissions in the Purpose and Need section justifies stopping this process, going back and reanalyzing the proposal and then issuing a new draft. Issuing an amendment to the draft should not be considered because of the extent and importance of the omissions.
- CHAPTER 2 Description of the Proposed Action and Alternatives
- Proposed Action
- 17-5** The last paragraph on page 2-2 states that a construction, operation, and monitoring (COM) plan would be developed prior to construction. This is a very important part of the project and should be subject to the same public review as the draft and final EIS. Notwithstanding any future public review opportunities, more details on construction, operation, and monitoring as they might apply to an alternative, need to be included in the discussion of this and all other alternatives.
- No Action Alternative
- 17-6** This alternative is dismissed with a single paragraph as not meeting the stated purpose and need. This indicated that the No Action Alternative would not be treated as a real alternative to the Proposed Action in this analysis, which proved to be true.
- Alternative Substation Locations
- 17-7** The alternative Stead-Airport Substation is not a real alternative. The location shown on maps contained within this draft show the alternative to be less than one-half mile from the location of the proposed Reno-Stead Airport Substation. This amount of variance can be expected during final location of the proposed action. Recommended that when the service area is defined, as suggested earlier in these comments, a real alternative, based upon predicted load and a defined service area be identified.
- CHAPTER 3 Affected Environment

## Responses

- 17-2**  
Refer to Response 16-1. The ECI report is publicly available on the BLM CCFO website (www.nv.blm.gov/carson). The project area as depicted in Figure 1-1 of the DEIS is the service area.
- 17-3**  
Refer to Response 16-1.
- 17-4**  
Refer to Response 16-1.
- 17-5**  
Once the final route is decided for the 120 kV Transmission Line project a detailed COM plan can be developed. The COM plan is based on the final design and routing determined through the ROD.
- 17-6**  
Comment noted.
- 17-7**  
This alternative was developed to address the different land ownership patterns (BLM versus Airport Authority of Washoe County). There is no defined service area for this substation; however, as discussed in Chapter 1 it is proposed to address the identified future need of the Airport Authority of Washoe County.

## Comments

### Socioeconomics and Environmental Justice

- 17-8 None of the data contained in tables 3-9 through 3-14 is refined to relate to a service area or even to a construction area. The figures are primarily county wide and difficult or impossible to use in assessing consequences to a specific area. Without such refinement, or at least an attempt at such refinement, this data is not an adequate base for analysis in Chapter 4 of this document.

### CHAPTER 4 Environmental Consequences

- 17-9 The third paragraph on page 4-1 states, in relation to impact analysis, that in the absence of quantitative data, best professional judgment prevailed. Using this rationale, best professional judgment should have been used to define a service area for this proposed power line if no definitive data was available.
- 17-10 Table 4-5 should be referenced in the summary. There is a lack of information on qualifying structures that are currently permitted but not yet built. Perhaps this could be included in table 4-5 ?

### Access and Transportation

- 17-11 The discussion on page 4-5 states that new access roads and overland travel routes not required for future maintenance would be restored following construction. The discussion fails to identify how many miles of new access roads and overland travel routes would be required in this alternative. The discussion for succeeding alternatives is equally lacking.

### Mitigation and Monitoring Measures page 4-8

- 17-12 The discussion states that SPPCo could petition and receive a variance. This would constitute mitigation principally to SPPCo, in that construction costs could potentially be reduced.
- 17-13 There is a lack of detail in this analysis. It is recommended that the document stay with mitigation outlined in RUCR and that such mitigation be specifically identified by extent and location. ( ie: miles of underground, miles of low visibility, etc.)

### Residual Impacts page 4-10

- 17-14 We do not agree that no residual impacts will occur. Increased system reliability, new housing, and the expanded service area will continue to exist.

### Geology and Soils

- 17-15 The discussion on page 4-12 states that there would be no impacts associated with seismic conditions. We disagree. There are nine fault crossings along the transmission

## Responses

### 17-8

The Proposed Action and alternatives cover approximately 34 to 46 miles of transmission line. The ROI for the Socioeconomics section was defined to include all areas affected by the length of the final route selected in the FEIS. By using county statistics, the affected environment section can show impacts for the whole project. All local and county plans are incorporated by reference and contain specific data

### 17-9

Comment noted.

### 17-10

The information provided in table 4-5 is also identified in table 2-3. Table 2-3 is now referenced in the summary. The following has been added as a footnote to Table 4-5: "Analysis does not include permitted but not built structures due to a lack of site-specific data."

### 17-11

Refer to Table 2-3.

### 17-12

For the FEIS, the following has been added at the end of the first paragraph of DEIS page 4-5: "At locations where RUCR Policy 2.3.6.5 would not be met, SPPCo would petition to receive a variance, conduct mitigation (see the Mitigation and Monitoring Measures section), or purchase at fair market value the structures within the 150-foot boundary." The first sentence of the first paragraph under Mitigation and Monitoring Measures on page 4-8 has been changed to: "At locations where the RUCR's 150-foot separation policy (Policy 2.3.6.5) would not be met (for separation between 120-kV overhead utilities and residential developments, schools, daycare facilities, and healthcare facilities), and where SPPCo does not receive a variance or purchase at fair market value the structures within the 150-foot boundary, mitigation would be conducted." The second sentence of this paragraph has been deleted. As stated on page 4-5 of the DEIS (first paragraph), the exact structures within the 150-foot corridor of the selected transmission route will be identified during the easement acquisition process prior to implementation. As such, exact mitigation at exact locations cannot be determined until route selection, although Figure 4-1 does identify those structures where mitigation is identified.

## Comments

## Responses

17-15 cont'd	line alternative routes, ranging from 5 to 9 depending upon the alternative. The document needs a map of these faults and the alternative crossings along with a worst case analysis before any conclusions concerning impacts and their intensity can be arrived at. Without these, the document is incomplete and does not meet the intent of NEPA.	17-13 Refer to response 16-12. Mitigation that will be required will be identified in the ROD.
	<u>Aesthetic Resources and Noise</u>	17-14 Comment noted.
17-16	We appreciate the reference to Appendix F. We question the lack of a KOP in the Silver Knolls area. We also question why there is no simulation of a switch back road to demonstrate the supposed benefits of this measure.	17-15 The text has been changed to identify seismic impacts as “negligible”. Worst case analysis is no longer required for NEPA.
	<u>Socioeconomics and Environmental Justice</u>	17-16 The BLM requires the use of KOPs for analyzing visual impacts on BLM land. No KOP was prepared for this area because the transmission line does not cross BLM land. Figure F3b in Appendix F of the DEIS provided a simulation of a switchback road.
	Growth Inducement	17-17 The project area as depicted in Figure 1-1 of the DEIS is the service area. Refer to response to 16-1.
17-17	We question the statement on page 4-71 that implementing the Proposed Action would not have a direct or indirect impact on growth in the region. The region is not defined and if the analysis was refined down to a service area, as it should be, an impact would be revealed. If, in fact, this project is responding to planned growth, it can be linked to population growth, increased housing, commercial development and economic activity. All of which should create a specific demand for electrical power. These figures, or a best professional judgment, refined for the proposed service area, must be included in this analysis.	17-18 Comment noted.
17-18	The flat statement that these ( unspecified ) needs are based upon land use planning by Washoe County and municipal governments, without any citations or references is inadequate for NEPA analysis. The analysis is not only unsupported by figures from or reference to specific plans, it is almost nonexistent. This is an error of omission so serious that the document fails to meet the intent of NEPA. This document needs to correct these omissions, be rewritten, and reissued as an amended draft: These errors are carried into the analysis of all alternatives.	17-19 Comment noted.
17-19	Growth is dependent upon a number of services. Electrical power is one factor. Where power exists, or is projected to exist, growth (both residential and commercial) is possible. Therefore, the existence, or projected existence of available electrical power is an inducement to growth and must be disclosed as such in this document. The non-responsive statement that it has already been factored in does not meet full disclosure requirements. The statement (page 4-71) that project growth has been planned for under the assumption that electrical power would be available is an admission that electrical power induces growth. This document is incomplete and inadequate without an analysis of this growth inducement effect.	17-20 Cumulative projects are defined in Chapter 4, Cumulative Impacts. This definition has also been added to the glossary.
	<u>Cumulative Impacts</u>	
17-20	The term <u>Cumulative Project</u> needs to be defined and included in the glossary.	

## Comments

- 17-21** Table 4-31 on pages 4-84 and 4-85 is a listing of reasonably foreseeable actions. Many of these projects anticipate growth such as; Reno-Stead Airport Development, Donovan Ranch, Eagle Canyon II, Eagle Canyon III, Pebble Creek and Oppio Development. Between 1962 and 2012 new single-family are projected in this table alone. Why isn't this data used to support and establish the purpose and need for the proposed power line?
- 17-22** The North Valleys Water Pipeline, listed in table 4-31, proposes to deliver 8000 acre feet of water annually to the Stead and Lemon Valley areas. The Intermountain Water Project, not listed in table 4-31, proposes to deliver 3500 acre feet annually to the northern part of Lemon Valley. The combined total of 11,500 acre feet of water is significant and would support a lot of new housing. Since water and electrical power availability are limiting factors for new development, it is logical to assume a combination of effect. This document does not include or analyze this effect currently. This document, in order to meet the intent of NEPA, must estimate the cumulative effect on growth. Just how many new housing units will now be possible? The 11,500 acre feet is much, much more than the amount necessary for the 2012 new housing units shown in table 4-31. The cumulative impact analysis, using best professional judgment, needs to estimate the number of new housing units and the extent of industrial/commercial possible due to the availability of electrical power and water. If this cumulative impact includes implementation of an industrial/ commercial complex at Reno-Stead Airport, the public must be informed. The advisability of the Airport Authority competing with private developers also begs examination and public comment.
- 17-23** Vegetation and Wetland Resources
- 17-24** This section of the draft EIS indicates that there is a long-term trend (see page 4-86) within this area to continue urban/suburban expansion. Even if this project has minimal direct effects on vegetative resources, the aggregation of growth projects and those enabled by this proposed powerline is of importance. The public needs to see, in this section, an aggregation (cumulating) of effects, not a blanket statement of no cumulative effects. This document does not accomplish a cumulative analysis as required by NEPA.
- 17-25** This document shows encroachment, by the proposed project, into the wetlands at Silver Lake. How does this project contribute to the other incremental encroachments within the Truckee Meadows? This also needs to be included in the analysis.
- 17-26** Socioeconomics and Environmental Justice
- This section (see page 4-88) seems to miss the point of cumulative analysis totally. The cumulative impacts of this and other growth serving (your draft EIS term) construction will be huge. This section should contain a snap shot of growth and growth effects within a defined service area for this powerline. It does not matter if the powerline is necessary because of projected growth or will be a cause of growth, it contributes to overall growth. This growth affects social and economic conditions and must be analyzed in terms of those effects.

## Responses

### 17-21

Chapter 1 states that: "The purpose of the Proposed Action is to provide reliable electrical capacity to the Spanish Springs Valley and Stead areas. Residential and commercial growth in these areas continues to increase, resulting in an increased demand for electricity beyond the capacity of the existing electrical supply systems." The residential and commercial growths that the statement refers to include the projects identified in table 4-31.

### 17-22

The North Valley Water Project and housing project are currently being analyzed and will include socioeconomic impact analyses.

### 17-23

Comment noted.

### 17-24

The BLM is not in the position to analyze decisions already made regarding urban growth through local land use planning. This growth is identified in the local and regional plans. Additionally, as noted in Table 4-31 of the DEIS, specific developments have already been approved.

### 17-25

None of the land around Silver Lake is public land. Refer to response 16-24. The Army Corps of Engineers administers wetlands.

### 17-26

As discussed in Chapter 1, the Proposed Action is in response to projected future growth as outlined in local master plans. Because this growth is planned for and currently occurring, the cumulative determination is the local economy and social systems are in place to accommodate it.

## Comments

### CONCLUSIONS

- 17-27 | A. There is insufficient demand demonstrated to support phase II. Therefor phase II should never be authorized without a new or amended EIS being issued.
- 17-28 | B. There is no demonstrated demand for the proposed Stead Airport Substation.
- 17-29 | C. The Foothills Alternative, without the Proposed Stead Airport Substation and the connecting line from Silver Lake Substation to the proposed Stead Airport Substation is the most logical alternative.

Silver Knolls Property Owners Association  
PO Box 60217  
Reno, NV 89506-0217

Jack Seley, Power Line Chairman  
Elizabeth Howe, President  
Dar Meredith, Vice President  
Joyce Gillespie, Recording Secretary  
Yvette Clark, Treasurer  
Vicki Johnson, Membership  
Tina Grasseschi, Board  
Ron Harrah, Board  
Lauri MacKay, Board  
Judy Lynn Mandeville, Board

## Responses

### 17-27

See Chapter 1, Project History.

### 17-28

Refer to response 16-1.

### 17-29

Comment noted.

## Comments

## Responses

Letter  
18



2003 DEC -5 AM 11:43

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FIELD OFFICE

December 4, 2003

### VIA EMAIL AND REGULAR MAIL

Terri Knutson, Planner  
United States Department of the Interior  
Bureau of Land Management  
EIS Project Manager  
Carson City Field Office  
5665 Morgan Mill Road  
Carson City, NV 89701

Re: Proposed Tracy-Silver Lake Transmission Line Project (the "Proposed Project")

Dear Ms. Knutson:

I would like to express my appreciation for the extensive time you spent with me regarding the Draft Environmental Impact Statement ("DEIS") for the Proposed Project. Your knowledge and experience was very helpful in understanding the EIS process and the Proposed Project.

I respectfully submit this letter to serve as Barker Coleman Communities' formal comment regarding the Proposed Project.

As I indicated, Barker Coleman Communities is in the process of completing two approved residential communities comprising approximately 1,000 single family homes known as "Sunrise at Eagle Canyon" and "Eagle Canyon North", in the vicinity of Eagle Canyon Drive, the Hawco Business Park, and the Pyramid Lake Highway. The DEIS shows that all proposed power line routes of the Proposed Project are within the proximity of the two communities. As I indicated, Barker Coleman Communities has no objection to Sierra Pacific Power Company's preferred route or to four of the five possible alternative routes. We believe the Proposed Route (Figure 2-2 on page S-17) by Sierra Pacific Power Company is most effective and efficient and least obtrusive to the homeowners in all affected areas.

18-1

4741 Caughlin Parkway, Suite 4 • Reno, Nevada 89509 • 775.828.5111 • Fax 828.6501 • www.barkercoleman.com

18-1

Comment noted.

## Comments

Terri Knutson, Planner  
United States Department of the Interior  
Bureau of Land Management  
EIS Project Manager  
Carson City Field Office  
December 4, 2003  
Page 2

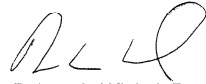
18-2 However, the overhead power lines under the Foothills Alternative (Figure 2-10 on page S-22 of the DEIS) are proposed to be located immediately adjacent to our Sunrise at Eagle Canyon Community. Currently, no power lines or other obstructions to the beautiful mountain and open space views exist in that area. As a result, we are deeply concerned that construction of the Foothills Alternative would have a substantial adverse unanticipated affect on the homeowners in these communities.

Barker Coleman Communities has a long history of constructing well planned communities and quality homes for the residents of northern Nevada. While we recognize the importance for providing necessary infrastructure for residential, commercial and industrial services, it should be provided in a manner that is not to the detriment of current and future residential communities.

I appreciate the opportunity to comment on the proposed project. In the event that I may provide you with additional information, please feel free to contact me. In addition, I again respectfully request that you provide information to me regarding any developments or adjustments to future routes.

Respectfully,

Barker-Coleman Communities



Robert A. Winkel, President

RAW/dk  
c: Karl Matzoll  
Chris Barrett

## Responses

18-2

Comment noted. All five alternatives to the Proposed Action (excluding the No Action Alternative) were developed from public input during the scoping process. Each alternative has been deemed a viable alternative and therefore must be included in the final EIS. The final selected route will take into account community concerns such as aesthetics and property values.

## Comments

## Responses

Letter  
19

December 11, 2003

2003 DEC 15 PM 12:30

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BLM Carson City Field Office  
Attn: Terri Knutson, Planner  
5665 Morgan Mill Road  
Carson City, NV 89701

RE: Tracy-Silver Lake Transmission Line Project

Dear Ms. Knutson:

This letter is written on behalf of Citadel Broadcasting Company ("Citadel"), Licensee of Radio Station KKOI ("KKOI"), Reno, NV, and is submitted as Public Comment per solicitation by the Bureau of Land Management in its Draft Environmental Impact Statement Summary dated September 2003 with regard to the proposed Tracy-Silver Lake Transmission Line Project.

KKOI, an AM Radio Station, is licensed by the Federal Communications Commission ("FCC") to operate on a frequency of 780kHz at a power level of 50kW from its transmitter facility located at 7800 Chickadee Drive near the Stead Airport in Lemmon Valley. The station is classified as non-directional by day, directional by night. The antenna system is comprised of an in-line array of three broadcast towers, each 319' tall.

With its high power, vast coverage area, and heritage in Northern Nevada, KKOI is a primary source of information for thousands of listeners, a major servant in the public interest, and key element of the local and state Emergency Alert System ("EAS") for both Northern Nevada and Northeastern California. It is the designated Local Primary One station for the EAS System in these areas. Furthermore, KKOI is one of 30 strategically located and chosen stations in the Continental United States with a direct connection to the Federal Emergency Management Agency as a Primary Entry Point ("PEP") station. In the event of a national crisis, PEP stations will be a fundamental means of Presidential communication to the general public. The KKOI transmitter facility has been appropriately equipped and hardened by the federal government to insure its operability in the event of extraordinary circumstances. Let there be no misconception: KKOI is an important tool in the preservation of Homeland Security in this post 9/11 society.

As a directional AM station, KKOI is subject to stringent operating parameters as detailed in the station license. Furthermore, due to unusually specific constraints on the station's nighttime coverage toward Chicago, IL, the antenna operating parameters of KKOI are approximately six times more restrictive than that of a typical directional AM station. KKOI has the correct operating and monitoring equipment in use to comply with the terms of the station license. All parameters are regularly measured and kept in tolerance.



## Comments

## Responses

At times, environmental changes do cause minor shifts in the performance of the antenna system. Heavy ground moisture, for instance, is detectable by the monitoring equipment and adjustments are made to the antenna system when necessary in order to maintain legal operating parameters. Another scenario that can alter the operating parameters of the antenna system and the resulting radiation (coverage) pattern is the construction of substantial metallic objects within the near-field of the antenna system. Such construction can take many forms; in this case, in the form of the proposed Trace-Silver Lake power line.

19-1

The “Proposed Action” and the “Calle de la Plata Alternative” would place the power line immediately adjacent to the property that serves as the KKOH transmitter site, the latter route actually adjacent to the property on two sides. Although the poles depicted in the EIS Statement are wooden, the conductors themselves will obviously be metallic, conductive, and quite lengthy. It is our concern, and the concern of the broadcast engineering consultants we have counseled with, that the proximity of the proposed line and the lengths of the conductors themselves will result in significant re-radiation of the KKOH signal by the new power line itself. Any re-radiation of the KKOH signal by the new power line would potentially place KKOH in an out-of-tolerance condition – through absolutely no fault of its own. Furthermore, since KKOH is required to operate within tolerances for both the (operating) antenna system as well as the coverage produced (field measurements) by the antenna system, interference induced by man-made sources beyond the boundaries of the KKOH property would likely be uncorrectable by normal adjustments to the antenna system itself. That is, to correct a defective signal level in the field would likely place the operating parameters out of tolerance, and vice versa. The scenario would likely be difficult to cure, requiring significant effort and funds from Citadel and close, perpetual cooperation from Sierra Pacific Power Company (“SPPC”) for any chance of a permanent resolution.

19-2

It is our hope that as an FCC Licensee itself, SPPC recognizes its obligations with respect to construction within the vicinity of other Commission Licensees – specifically AM broadcast stations such as KKOH. 47 CFR 73.1692 (c)(d) refer to construction within .8km and 3.2km of non-directional AM stations and directional AM stations, respectively. (We estimate the distance of the proposed transmission line to the KKOH antenna system to be .4km, or less.) As detailed above, KKOH operates non-directional by day and directional by night. Hence, the burden on KKOH would be to perform partial antenna proofs on both antenna systems PRIOR to the start of ANY construction by SPPC, and then subsequent proofs on both antenna systems AFTER the completion of ALL construction. This significant burden would be thrust upon KKOH due to no fault of its own.

19-3

Note, that if the antenna pattern of KKOH became distorted during construction of the power line, KKOH would be forced to request special temporary authority from the FCC in order to operate with reduced power and/or parameters-at-variance until such time as the AFTER measurements could be performed, analyzed, and the issues resolved.

19-1

SPPCo is funding third-party consultant analysis of issues in cooperation with KKOH to determine any impacts and mitigation measures.

19-2

Refer to response 18-1.

19-3

Refer to response 18-1.

## Comments

**19-3** | Axiomatically, a reduction of station power would be counter-productive to the performance and success of the radio station, and would be undesirable in its own right.

**19-4** | Mathematical evaluation of the antenna proofs would be able to determine the extent of distortion to the KKOH radiation pattern, although not necessarily be able to pinpoint the exact location or cause. An iterative process of locating signal anomalies in the vicinity of the power line and then attempting to eliminate them would be followed by additional proofs of the antenna system. During every directional proof of the antenna system, KKOH would be forced to operate using its nighttime antenna pattern during daylight hours, eliminating virtually all service to the population east of the Reno area. This alone bears significance as it will impact KKOH's ability to serve the public, to act as the EAS and PEP station, and result in losses to listener ratings and income. Furthermore, the elimination of re-radiation from the SPPC line would carry a significant cost. KKOH is not prepared to shoulder these costs, nor should it be required to.

It is our respectful request that the "Proposed Action" and the "Calle de la Plata Alternative" routes be disqualified for the proposed Tracy to Silver Lake transmission line, as they represent a potentially SIGNIFICANT impact to Radio Station KKOH, its existing transmission system, and the possible elimination of the use and enjoyment of its property as a transmitter site.

If either the "Proposed Action" or the "Calle de la Plata Alternative" route is approved for the Tracy to Silver Lake transmission line, Citadel, as Licensee of KKOH, respectfully requests the full material and financial commitment and cooperation of SPPC with respect to the following: proactively designing the transmission line to minimize any impact to KKOH; constructing the line as recommended by consulting engineers knowledgeable in such broadcast-related issues; to locating and eliminating sources of re-radiation; and, to maintaining any necessary detuning apparatuses on the transmission line system *in perpetuity*. It is only with these commitments from SPPC that we can hope to continue our successful use of the current KKOH transmitter facility.

Your consideration of these matters is sincerely appreciated. Thank you.



Martin Stabbert, Chief Engineer  
SBE Certified Senior Radio Engineer  
Citadel Communications Corporation - Reno

## Responses

**19-4**  
Refer to response 18-1.

## Comments

## Responses

Letter  
20



### Golden Valley Property Owners' Association

Post Office Box 60373, Reno, NV 89506

December 13, 2003

Ms. Terri Knutson  
EIS Project Manager  
USDI Bureau of Land Management  
Carson City Field Office  
5665 Morgan Mill Road  
Carson City, Nv. 89701

2003 DEC 15 PM 12:16  
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SUBJECT: Comments on Draft EIS Tracy to Silver Lake Transmission Line

Dear Ms. Knutson,

The Golden Valley Property Owners Association's Board of Directors voted at its December 10, 2003 meeting to submit the following comments in response to the subject Draft EIS.

20-1

The Board's preferred alternative is one referred to as the North Valley Alliance Alternative which utilizes the Existing Alternative from North Valley Road to Stead Boulevard. From this point north to the Silver Lake Substation the line would be buried. This alternative could be a combination of the Proposed Route and Existing Alternative or just the Existing Alternative as described in the Draft EIS. It would meet the purpose of the proposed action to provide reliable electrical capacity in the Spanish Springs Valley and Stead areas. Reference table 2-3, which is misleading because the numbers of units shown for the various features being compared probably already exist, and will not all be created if the existing alternative becomes the proposal!

20-2

The Board adamantly opposes the Southern and Foothills Alternatives because of the potential adverse impacts of larger aerial line on scenic, community character, and property values in Golden Valley. The Draft EIS does not accurately disclose these impacts. These alternatives basically parallel the Existing Alternative from Golden Valley to Stead, being within one mile of each other in places. They also impact other communities in the North Valleys.

EIN 75-3039337

20-1

Refer to response 11-1.

20-2

Comment noted.

## Comments

20-3

One can more easily understand the need for this proposal to serve the Spanish Springs area due to growth during the past 10 years. The need is not as clearly indicated for in the North Valleys area. Especially when some folks remember statements and records associated with Sierra Pacific and the Alturas Transmission Line during its planning and development. That line terminated at the North Valley Road Substation. Some feel that supposedly allowed Sierra Pacific to avoid construction of other transmission lines in the North Valleys, allowing it to address transmission system limitations between the Tracy substation and the North Valley Road Substation.? Also, didn't the Border Town substation allow Sierra Pacific to distribute power to the south and east in response to future demands without additional transmission lines?

20-4

Another question in the North Valleys area is- Was the existing 60 KV line from North Valley Road along old North Virginia Street to Stead recently upgraded to 120 KV? Why and how does that action fit into this proposal?

The fore mentioned comments about the Southern and Foothills Alternatives, and questions pertaining to the Alturas Line needs to be included in and responded to in the Final EIS, as does the North Valley Alliance Alternative.

Thank you for the opportunity to comment. The Board sincerely hopes the enclosed comments are considered in the final EIS. If we can be of assistance or you have questions please contact Gary Sayer, Association President at telephone 775-972-7823.

Sincerely,



Gary Sayer, President  
Golden Valley Property Owners Association  
P.O. Box 60373  
Reno, NV. 89506

cc: Pete Sferrazza, Washoe County Commissioner  
Bonnie Weber, Washoe County Commissioner  
Bill Whitney, Washoe County  
GVPOA Board Members  
Steve Rogers, member of County and Regional Planning Commissions

## Responses

20-3

As discussed in Chapter 2, the Bordertown substation is not viable.

20-4

The existing 60 kV line from North Valley Road along old North Virginia Street to Stead was upgraded to a 120 kV in 2001 as part of a routine system upgrade. The upgrade did not require additional environmental analyses or a Special Use Permit to be upgraded. The proposed action will tie into the stretch of line to complete the loop as described in the purpose and need.

## Comments



Letter  
21

November 10, 2003

VIA FACSIMILE 775/885-6147 AND FIRST CLASS MAIL

BLM Carson City Field Office  
Attn: Terri Knutson, Planner  
5665 Morgan Mill Road  
Carson City, NV 89701

VIA FIRST CLASS MAIL

Sierra Pacific  
Attn: Shauna Adams, Senior Manager, Project  
PO Box 10100  
Reno, NV 89520-0026

RE: TRACY-SILVER LAKE TRANSMISSION LINE PROJECT COMMENTS

Dear Terri and Shauna,

21-1

We are in receipt of the "Draft Tracy-Silver Lake Transmission Line Project EIS Summary" and strongly oppose the "Proposed Route" as it is shown on Figure 2-9 in the color blue on the legend. The reason is that the "Proposed Route" runs along the Northeastern boundary of APN 090-010-42, which is a site that has been in the planning stages for a residential development over the last 6 months. We do not believe that it is a good idea to be placing transmission lines next to residential developments; therefore we are very concerned and strongly oppose the "Proposed Route". The "Alternative Route" as it is shown on Figure 2-9 in the color red on the legend and heading east away from APN 090-010-42 is an adequate solution.

The owners of the property (APN 090-010-42), Mr. James L. Murphy, Mr. Harold P. Dayton and Mr. Richard B. Rowley, trustees of the Moya Olsen Lear Trust and Lear Family Trust B, also strongly oppose the "Proposed Route" because of its proximity to our planned residential development for their property.

We are currently in escrow with Western Title Company, Inc. under escrow number 00137228-102-TEM to purchase the property and will be moving forward with our proposed residential development, which could occur prior to the construction of the transmission line.

A copy of the site plan and location of APN 090-010-42 relative to the "Proposed Route" of the transmission line is attached.

Please do not hesitate to contact us if you have any questions or comments at either (775) 824-6000 Ext. 226 or (775) 691-1027. Again, we are strongly against the "Proposed Route".

Sincerely,  
Centex Homes, Northern Nevada Division

Michael Hughes  
Land Acquisition Manager

Cc: Mr. James L. Murphy, Moya Olsen Lear Trust and Lear Family Trust B.  
Mr. Harold P. Dayton, Moya Olsen Lear Trust and Lear Family Trust B.  
Mr. Richard B. Rowley, Moya Olsen Lear Trust and Lear Family Trust B.  
Mr. David Freilicher, Regional General Counsel  
Ms. Lesley D. Berger, Regional Paralegal  
Mr. Robert J. Romo, Division President

2003 NOV 12 PM 12:24  
RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE  
Centex Homes - Northern Nevada  
9800 Prototype Court  
Reno, NV 89521  
Phone: (775) 824-6000  
Fax: (775) 824-6006

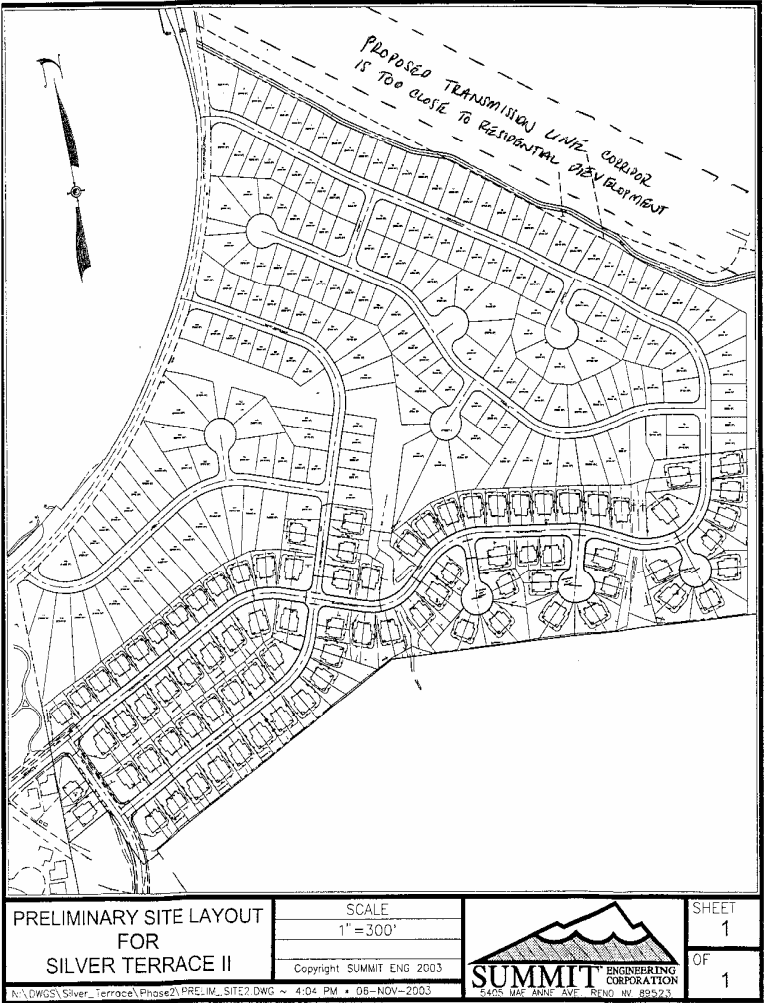
## Responses

21-1

Comment noted. The Proposed Action was identified by Sierra Pacific Power Company in their Right-Of-Way application to the BLM. All five alternatives (excluding the No Action Alternative) were developed from public input during the scoping process. Each alternative has been deemed a viable alternative and therefore must be included in the final EIS. The final selected route will take into account community concerns such as aesthetics and property values.

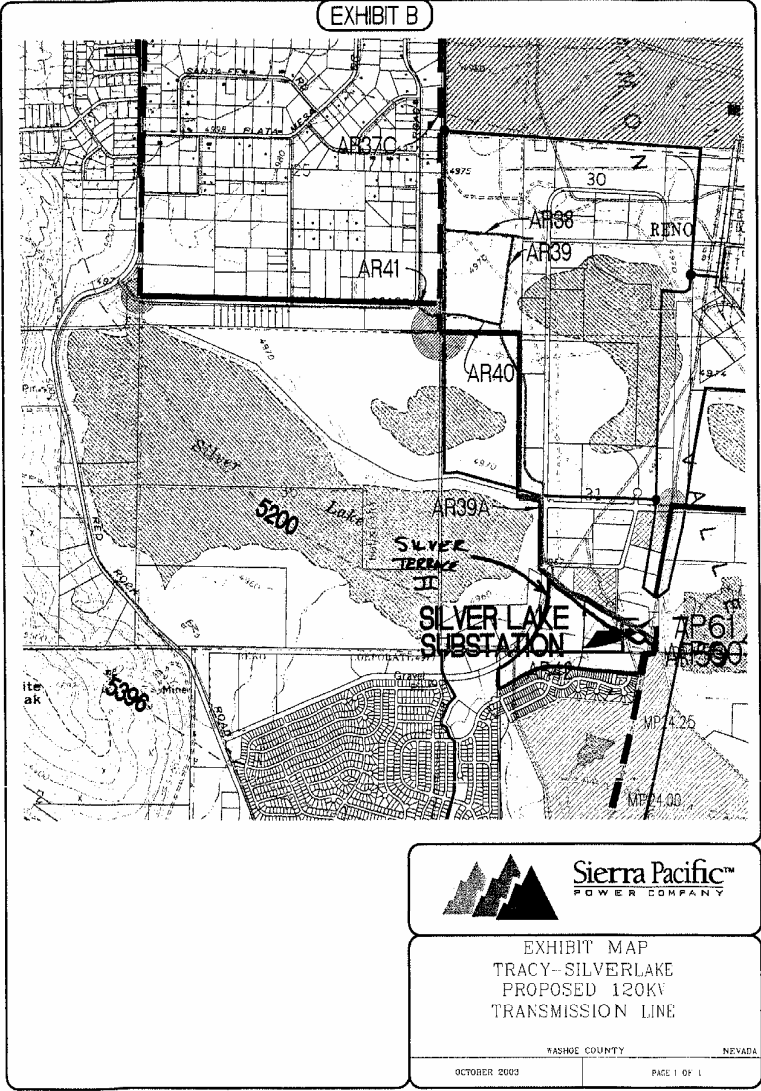
Comments

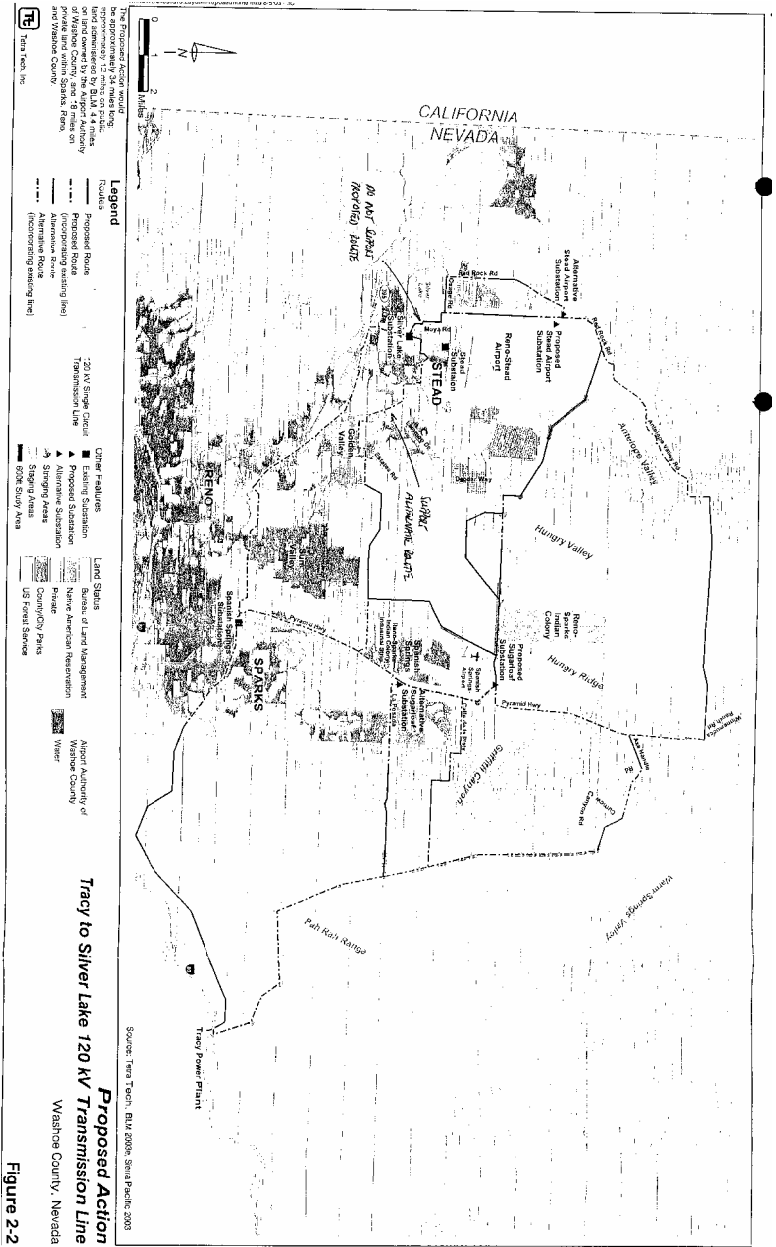
Responses



Comments

Responses



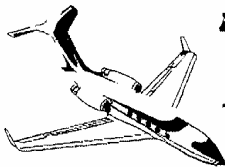




## Comments

## Responses

Letter  
22



**Aircraft Funding Group**  
7995 Tres Arroyos Dr  
Sparks, NV 89436  
775-425-1200 Fax: 775-425-1222

BLM Carson City Field Office  
Attn: Terri Knutson, Planner  
5665 Morgan Mill Road  
Carson City, Nevada 89701  
Fax (775) 885-6147  
10-29-2003

To Whom It May Concern: Reference 2800 (NV030)

The only proposal on the Tracy to Silver Lake Transmission Line Project that makes any sense is the Northern Alternative route.

22-1

There is already more construction going on in this area to have to navigate around. I think it makes for a lot less inconvenience for all the families that live in the Spanish Springs and Sparks area to go the northern route where there are a lot less homes and school children to be concerned about.

Sincerely:

A handwritten signature in cursive script that reads "Jack L. Reams".

Jack L. Reams

22-1

Comment noted.

## Comments

**Pierre A. Hascheff, Chtd.**  
A Professional Corporation

**Letter**  
**23**

1026 Riverside Drive  
P.O. Box 40647  
Reno, Nevada 89504

Telephone (775) 786-1121  
Facsimile (775) 786-1122  
pahascheff@aol.com

January 12, 2004

**Facsimile**

Mr. Bill Roulter  
Sierra Pacific Power Co.  
6100 Neil Road  
Sparks, Nevada 89509

**Facsimile**

Ms. Terri Knutsen  
United States Department of Interior  
Bureau of Land Management  
Carson City Field Office  
5665 Morgan Mill Road  
Carson City, Nevada 89701

Subject: Tracy Clark Silver Lake EIS  
Our File: 63253.001

Dear Ms. Knutsen and Mr. Roulter:

Please be advised Broken Hill, Inc. is the property owner of approximately 640 acres in Spanish Springs Valley. Martin Marietta currently retains an option to acquire the property and as a result, they have an equitable interest in the property. Both the proposed action and Calle de LaPlata alternative route locate the Tracy power line on the Broken Hill property approximately 20 feet from its northern boundary. As a result, this letter is submitted to provide comments to the proposed alternatives.

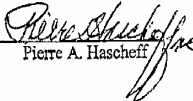
**23-1**

The Broken Hill property has proven reserves of high quality aggregate material. As a result, the property can be used as an extension of the existing Martin Marietta mining operations currently located on the BLM property just to the north. As a result, the location of the power lines would interfere with the future uses of the property unless properly planned and designed. It is my understanding as part of the analysis conducted in the environmental impact study, Sierra Pacific gained entry to the Broken Hill site and extended its review approximately 300 feet. Accordingly, we request Sierra Pacific extend its review to provide a more thorough analysis of the different options which are available for placing the line on the Broken Hill property so as not to not interfere with the property's future uses. Should the proposed action or Calle de LaPlata alternative be selected, there must be a complete analysis, otherwise, placement of the lines will have a material, adverse effect on the Broken Hill property. Broken Hill requests completion of this additional analysis before any routes are chosen on the Broken Hill. Broken Hill reserves any further objections until this analysis is complete.

As always, should you have any questions, please feel free to contact my office.

Very truly yours,

**Pierre A. Hascheff Chtd**

By:   
Pierre A. Hascheff

PAH:njc  
c: Roselyn Bar, Esq.  
Bert Adams, Esq.  
Rich Moses

## Responses

**23-1**

If an alternative is selected that routes the line thru the Broken Hills property, Sierra would consult with the property owner prior to placement of that line to ensure that any conflicts are mitigated.

Letter  
24



www.sierrapacific.com

6100 Neil Road, P.O. Box 10100, Reno, Nevada 89520-0024 • 775.834.4011

## Comments

RECEIVED  
BUREAU OF LAND  
MANAGEMENT  
CARSON CITY  
FIELD OFFICE

2003 DEC 16

December 10, 2003

Ms Terri Knutson  
EIS Project Manager  
Carson City Field Office  
5665 Morgan Mill Road  
Carson City, NV 89701

RE: Comments on the Draft EIS Dated September 2003

Dear Ms. Knutson,

Sierra Pacific Power Company (SPPCo) proposed the Tracy to Silver Lake 120 kV transmission line and associated substations to improve the reliability and increase the capacity of the electric system in the Spanish Springs Valley and Stead areas. Under its certificate of public convenience and necessity granted by the Public Utilities Commission of Nevada, Sierra is obligated to provide to all customers within its service territory reliable, safe, environmentally sound and cost effective electric service.

Pursuant to 40 CFR Part 1503.1(a)(3), SPPCo is hereby submitting comments to the Tracy to Silver Lake Draft EIS dated September 2003 for your consideration. SPPCo comments are presented below.

### EXECUTIVE SUMMARY

24-1

1. Page S-2, Column 2, Land Use Section – The Regional Utility Corridor Report (RUCR) identifies three other types of mitigation besides underground construction. They are low EMF designs, low-visibility designs, and off-site mitigation. These three measures should also be presented in this section.

24-2

2. Page S-3, Table S-1, Column 1, Land Use Mitigation – SPPCo has not identified any federal, state or local regulations or codes that support the requirement to purchase at fair market value the structures within the 150-foot boundary. SPPCo would not be required to purchase these structures. Please clarify this statement or remove.

24-3

3. Page S-12, Column 1, 1<sup>st</sup> full sentence – ‘approximate’ should replace ‘appropriate’ so the sentence reads as follows; *The approximate number of structures within the 150-foot buffer for each alternative is as follows:*

## Responses

24-1

Text changed to read: New overhead electrical transmission corridors and facilities (60-kV or larger) proposed on public lands would be discouraged in favor of:

- using existing corridors,
- routing on private land,
- constructing lines underground,
- utilizing low EMF or low-visibility designs;

or implementing off-site mitigation.

24-2

Specific mitigation measures to be implemented will be identified in the ROD.

24-3

Text revised.

## Comments

- 24-4 | 4. Page S-13, Column 1, Vegetation and Wetland Resources Section – Typo, ruderal should be replaced with rural.
- 24-5 | 5. Page S-16, Column 1, Socioeconomics and Environmental Justice Section – The statement in the second paragraph, ‘the existing corridor alternative would cost two times more to build than the proposed action, but would likely require the least land acquisitions’ is not entirely accurate. Land acquisition would be required to expand the existing easement associated with the existing corridor alternative. Sentence should read as follows “ *Where we parallel existing lines, we will need additional easement. This would result in the expansion of existing easements that could be detrimental to residual property values.*”
- 24-6 | 6. Add Table 2-3 from the Draft Environmental Impact Statement (DEIS) to the Executive Summary. Add a column quantitatively analyzing the reliability of the proposed action and the alternatives. It is important to point out the number of line miles where the alternatives achieve the reliability aspect associated with Sierra’s purpose and need for this project. Reliability is severely compromised when two transmission circuits meant to back each other up are placed in the same corridor. For example, all thirty-four miles of the proposed action will meet this reliability need whereas approximately eight out of the thirty-eight miles of the Existing Corridor meet the reliability need. Another option would be to break down the proposed action and alternatives utilizing a percentage.

### DRAFT ENVIRONMENTAL IMPACT STATEMENT

- 24-7 | 1. General Comment – While the criteria for developing alternative routes is discussed in the DEIS, there is no mention of how the co-operating agencies will work together in selecting a final route and the selection criteria. Please add specific criteria or describe the selection process as to how the final route will be determined within the final EIS.
- 24-8 | ✓ 2. Page 1-3, right column, 2<sup>nd</sup> paragraph, 2<sup>nd</sup> to last sentence - Typo, SPA 278 should be SPA 273.
- 24-9 | 3. Page 2-9, Site Preparation and Excavation, paragraph 1, line 1 and paragraph 2, line 1 – Following consultation and review with Construction Management, please change the area of temporary disturbance to 0.40 acre from 0.08 acre for single poles and 0.8 acre from 0.4 acre for angle structures. This will increase temporary disturbance within the study corridor.
- 24-10 | 4. Page 2-13, Table 2-3, comparison of Proposed Action and Alternatives – Add a column quantitatively analyzing the reliability of the proposed action and the alternatives. It is important to point out the number of line miles where the alternatives achieve the reliability aspect associated with Sierra’s purpose and need for this project. Reliability is severely compromised when two transmission circuits meant to back each other up are placed in the same corridor. For example, all thirty-four miles of the proposed action will meet this reliability need whereas approximately eight out of the thirty-eight miles of the Existing Corridor meet the reliability need. Another option would be to break the proposed action and alternatives down utilizing reliability percentage.

## Responses

- 24-4 | Text remains. The word “ruderal” refers to a specific habitat type. The sentence did not refer to a rural area.
- 24-5 | Text revised.
- 24-6 | Table 2-3 has been added to the Summary. Transmission line reliability miles have been added to table 2-3.
- 24-7 | The following text has been added to Chapter 1: “At the end of the 60 day Public Comment Period on the Draft EIS, the BLM and cooperating agencies will collectively respond to comments and produce a Final EIS. Within the Final EIS the cooperating agencies will work to identify a preferred alternative based on the consistencies with the plans and policies of the individual jurisdictions. The BLM will evaluate the suggested preferred alternative routes from the cooperating agencies and finalize an overall final preferred route for the project. The preferred route will be identified in the ROD.”
- 24-8 | Text rewritten.
- 24-9 | The number of acres is based on an average to obtain a total area of disturbance for each alternative. The actual COM plan will provide more specific areas of disturbance. The calculations presented in table 2-4 of temporary disturbance included a wide range of variability to account for different site conditions.
- 24-10 | Refer to response 23-6.

## Comments

## Responses

- |       |   |
|-------|---|
| 24-11 | <p>5. Page 2-22, 2<sup>nd</sup> column, Existing Corridor Alternative, 3rd paragraph – Sierra has many concerns regarding this alternative. It should also be noted in addition to the narrow construction window that becomes more narrow as growth continues and lack of reliability associated with this alternative, the ability to take the Alturas power line out of service has numerous complications including a significant economic impact. While the precise dollar amount is uncertain, a rule of thumb is the difference in the cost of internal higher cost generation replacing the lower cost power that would be scheduled over the line if it (the line) were available. This increased cost for removal of the Alturas line has been estimated to be approximately \$1,000,000 for every month the line is removed from service. This cost estimate is dependent on many factors including energy prices at the time, the availability of other transmission options, fuel prices, load and generation availability.</p> <p>Coordination with the other transmission customers that hold transmission rights on the Alturas line is another issue. Timing and length of the outage would depend on their needs. Reconstruction of this section of line could take as long as six months that could greatly extend the time of construction.</p> |
| 24-12 | <p>6. Page 4-1, 4<sup>th</sup> bullet, Off-site mitigation – This should be defined and expanded as per the RUCR, page 14, Sec 2.3.4. , lines 21 through 25 and page 15, lines 1 through 3.</p>   |
| 24-13 | <p>7. Page 4-2, Table 4-1, Summary of Potential Land Use Impacts, Impacts per RUCR, 150-foot separation impact – Table 4-1 has identified significant impacts to two structures on the Calle de la Plata alternative. This being the case, it would seem necessary to identify the Alternative Sugarloaf Substation as a significant impact as well. The Alternative Sugarloaf Substation site is located within 150 feet of several residences.</p>  |
| 24-14 | <p>8. 4-8, Mitigation and Monitoring Measures, 1<sup>st</sup> paragraph, 8<sup>th</sup> line – the document states “variances will likely only be issued for areas where the line is within an existing identified corridor.” What is the source of this statement? If it cannot be documented in regulations, the statement should be removed.</p>   |
| 24-15 | <p>9. 4-17, Mitigation and Monitoring Measures, 2<sup>nd</sup> to last paragraph – Staying with BLM’s State office’s intent of trying to maintain consistency within the BLM field offices, a five hundred foot blasting buffer was determined to be sufficient for the Falcon to Gonder 345 kV project. Throughout the course of construction, this five hundred foot buffer has prevented adverse impacts to water resources.</p>   |
| 24-16 | <p>10. 4-31, Wildlife Resources, Mitigation and Monitoring Measures, 3<sup>rd</sup> and 4<sup>th</sup> paragraphs – As indicated in the bullet above, maintaining consistency within BLM field offices is a goal of the State office. A construction buffer from ¼ to ½ mile for raptor protection has been used with success on the Tuscarora pipeline projects and the Falcon to Gonder 345 kV project. The one-mile buffer is unnecessary.</p>   |
| 24-17 | <p>11. 4-35, Special Status Species, Mitigation and Monitoring Measures, 1<sup>st</sup> paragraph – The pygmy rabbit is not listed as an endangered species in the project area but is listed as a species of concern. As such, a Section 7 Consultation with the USFWS is not required. Change this wording to say: “If pygmy rabbit is found to be present, the BLM would consult with the USFWS to incorporate measures to</p>   |

**24-11**

Comment noted.

**24-12**

The definitions of mitigation in the RUCR are incorporated by reference.

**24-13**

The Proposed Sugarloaf Substation, Proposed Reno Stead Airport Substation, and Alternative Reno Stead Airport Substation are not within 150 feet of any occupied or inhabited structures that are part of residential developments, schools, daycare facilities, or healthcare facilities. The Alternative Sugarloaf Substation is within 150 feet of two structures, which may be occupied or inhabited structures and part of residential developments, schools, daycare facilities, or healthcare facilities. If so, mitigation would be required per RUCR Policy 2.3.6.5. Table 4-1 has been changed to show major impacts for the Alternate Sugarloaf Substation. Table 4-5 has been updated to include the four potential substations. The following has been added at the end of the Alternative Sugarloaf Substation - Land Use paragraph on page 4-8 of the Draft EIS: "As shown in Table 4-5, there are two structures within 150 feet of the proposed substation (or transmission line centerline), which violates Policy 2.3.6.5 and would therefore constitute a major impact. Whether or not the two structures qualify would be identified during the easement acquisition process prior to implementation. At locations where Policy 2.3.6.5 would not be met, SPPCo would petition and receive a variance, conduct mitigation (see the Mitigation and Monitoring Measures section), or purchase at fair market value the structures within the 150-foot boundary."

**24-14**

The sentence has been deleted.

**24-15**

Comment noted.

## Comments

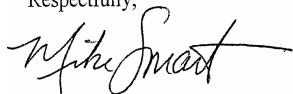
- 24-17 | avoid impacts.” This language is similar to what was stated for burrowing owls, a  
cont’d | species of concern.
- 24-18 | 12. 4-42, 1<sup>st</sup> sentence and 4-45 – For clarity, replace this sentence “*As part of the  
Proposed Action and alternatives, SPPCo would replace existing distribution line  
segments with the proposed transmission line segments “and would incorporate  
the existing distribution segments onto the new poles. The new poles would be  
taller and have more lines.”*”
- 24-19 | 13. 4-58, 2<sup>nd</sup> column, 1<sup>st</sup> and 2<sup>nd</sup> paragraph – The sentence “The 50-foot poles and  
lines would have an impact because they would be within 1,000 feet of the end of  
the runway” is presupposing a determination by the FAA. SPPCo line  
construction will comply with FAA regulations. This is currently being reviewed  
by FAA.
- 24-20 | 14. 4-61, Mitigation and Monitoring Measures, 2<sup>nd</sup> paragraph – Again, SPPCo will  
comply with FAA regulations. The 20:1 ratio is not the only criteria that the FAA  
uses to review a project for impacts. There are other contributing factors taken  
into consideration. The project proponent must file appropriate forms to the FAA  
for their review to determine compliance with FAA criteria and mitigation  
measures.
- 24-21 | 15. 4-75, Existing Corridor Alternative, System Reliability and Cost Recovery, last  
sentence – For consistency within the document, remove the phrase “while the  
345 kV line is being energized.” For safety issues, construction on the 345 kV  
line will be done with the line out of service.
- 24-22 | 16. 4-80 – Add the Calle de la Plata alternative to this list.
- 24-23 | 17. 4-82, 2<sup>nd</sup> column, 2<sup>nd</sup> paragraph – This paragraph is a great summary.

### APPENDIX B RECLAMATION PLAN

- 24-24 | 1. B.1, 1<sup>st</sup> page, 2<sup>nd</sup> bullet – Is there a similar herbicide use plan for Nevada?
- 24-25 | 2. B.2, 2<sup>nd</sup> paragraph, 6<sup>th</sup> sentence – The 15 foot road width is not correct or  
consistent with the document. Typical road width disturbance will be 20 to 30  
feet.

Sierra Pacific thanks you for this opportunity to comment. If you have any questions,  
please contact Lee Simpkins directly at 834-3528.

Respectfully,



Mike Smart  
Vice President, Distribution Services

## Responses

- 24-16  
Based on conversations with USFWS, NDOW, BLM resource personnel, and  
upon review of other similar EIS documents the buffer of 1 -mile for other  
raptors was determined to be excessive. We feel that reducing the buffer to  
0.25 mile is sufficient and would result in no change to impacts.
- 24-17  
Refer to response 8-3.
- 24-18  
Page 4-41 and Page 4-45 text was revised.
- 24-19  
SPPCo will have to submit their application to FAA.
- 24-20  
Comment noted. FAA will make final determination.
- 24-21  
Text deleted.
- 24-22  
Text added.
- 24-23  
Comment noted.
- 24-24  
Text has been changed to state that “Herbicide use on BLM lands in Nevada is  
covered by the Vegetation Treatment on BLM Lands in Thirteen Western  
States Final Environmental Impact Statement (1991).”
- 24-25  
Text revised.

## Comments

## Responses

**Letter 25**  
November 24, 2003  
Tracy- Silver Lake EIS responses  
from Lori Burke  
275 Hill St. Ste 302  
Reno, Nevada 89501

2003 DEC -1 PM 2: 17

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

Dear Ms. Knutsen,

Thank you for your return phone call on November 18th. I anticipate receiving copies of the ECI 2002 document referenced in the DEIS page 1-3, "Project History". I'm wondering if this is the report Sierra Pacific directed ECI to prepare when the coalition, "Community Friendly Power Facilities," successfully challenged many of the Company's assertions and figures in the 1999 Tracy-Sugarloaf application. If so, the coalition's initial response to the ECI report was that the analysis was so constrained by the system operational parameters Sierra Pacific imposed and the data supplied that it was non responsive to many of the questions from the coalition and County Commissioners. However, before the contents of the report could be evaluated and reviewed in depth, the project application was withdrawn by the Company.

**25-1**

I am also looking forward to receiving the Johnson-Perkins Associates, 1999 property value report referred to on page 4-79. Since Sierra Pacific was the source of the report to th DEIS preparers, it is possible the preparers do not have the transcripts of the subsequent public meetings where several other appraisers, a Nevada Consumer Advocate staff member and well informed citizens credibly challenged many of the report's assessments and conclusions.

If the De Rosiers 2002 also sited was not part of the Johnson -Perkins report, I would appreciate a copy of that as well.

Thank you

*Lori Burke*

**Letter 26**  
November 25, 2003  
Tracy- Silver Lake EIS responses  
from Lori Burke  
275 Hill St. Ste 302  
Reno, Nevada 89501

2003 DEC -3 PM 12: 56

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

Dear Ms. Knutson,

As I indicated to you, I am working on an comparable analysis of OH (overhead)and UG (underground) issues. Per a 1999 Draft Position Paper on OH v UG costs, prepared by the independent electrical contracting firm EnergySource, "UG construction requirements for building 120 kV line transmission do not differ substantially from underground distribution." Dale Stransky, PE, of the Nevada Consumer Protection office confirmed the EnergySource statement. The DEIS does note that it is the trenching and underground infrastructure costs that largely make up the difference between underground and overhead cost on this project (P.2-, paragraph 3). However, it does not acknowledging that this same cost is necessary to install underground distribution lines. By featuring the discussion of underground installations as particular to 120 kV cable (Appendix A), the fact that miles and miles of underground distribution is required by development code and installed by the same trenching, vaulting, splicing and use of conduit in concrete methods all the time in the Truckee Meadows is obscured.

**26-1**

**26-2**  
Please provide me with a breakdown of the actual percentage of the 13,500 miles of Sierra's system have been built underground in the Truckee Meadows in the past 10 years (DEIS Appendix A), and a reasonable assumption about how many miles of underground and overhead distribution (including under ground intra system substation feeder lines) will be added here in the next five years. I am assuming that these figures will mesh with the growth projections used by local planning agencies as to how many new users will be served.

Thank you for your help.

*Lori Burke*

**25-1**

Comment noted.

**26-1**

See Table 2-1 from the DEIS for the estimated cost of undergrounding a 120-kV line. The total coast is different for undergrounding between a 25-kV line and a 120-kV line.

**26-2**

This comment is beyond the scope of this DEIS.

## Comments

## Responses

Letter  
27

November 26, 2003

Tracy- Silver Lake EIS responses  
from Lori Burke  
275 Hill St. Ste 302  
Reno, Nevada 89501

2003 DEC -3 PM 12: 55

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BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

Dear Ms. Knutson,

27-1

There is no credible reason for adding 10 million dollars to the construction cost using the existing corridor alternative. (Table 2-3, p. 2-13, discussion, pages 2-22 and 4-75 and similar cost associated with Bordertown Substation source elimination, p. 2-27) The assumption in the DEIS that it would be necessary to construct 10 miles of this project and keep all the existing 345 and 120 kV lines energized and/or their actual transfer capability intact and fully charged during construction should not be accepted.. Sierra Pacific has provided the "cost confirmation" by ECI to give substance to a ridiculously inefficient and unnecessary construction scenario.

27-2

Provide a new analysis prepared by an independent systems operating engineer familiar with the particulars of Sierra Pacific's system and the Western Systems coordinated capabilities that would utilize the following to economically schedule down time to facilitate a reasonable low or no cost construction schedule along the existing corridor alternative.  
(a) alternative scheduling on other interties and multiple transmission paths available,  
(b) capabilities of both owned and embedded generation facilities,  
(c) available spinning and "emergency" reserves,  
(d) daily seasonal and contractual load fluctuations,  
(e) the associated 345 kV , 345/ 120kV and 120/ 60 kV substation capabilities, including the phase shifter at Bordertown,  
(f) the "band aids" added in the Spanish Springs area since 1997.(Carol Roth, 6-18-1999 ltr to Wa Co Comm Devel.) and the Penny's Tap upgrade.

The above list was developed with professional help familiar with Sierra Pacific's system, particularly construction and maintenance. Furthermore, I have seen all these suggested as no-cost- or low-cost low methods in numerous other EIS's and planning documents (including Sierra's) to facilitate construction and maintenance of numerous facilities.

27-3

Furthermore, redone cost assumptions for this alternative should include reasonable access to new adjacent ROW where necessary, savings associated with combining ROW's (commonly done in congested areas) and in using existing and modified facilities where feasible

Sincerely,  
Lori Burke



27-1

Comment noted.

27-2

The BLM received a ROW application for a transmission line. The DEIS is an analysis of the impacts associated with constructing that powerline. Although, socioeconomics and costs are a factor in the analysis, they are not the main driving forces behind the environmental analysis.

27-3

Refer to response 11-23.



## Comments

## Responses

**Letter** December 3, 2003  
**28** Tracy- Silver Lake DEIS responses  
from Lori Burke  
275 Hill St. Ste 302  
Reno, Nevada 89501

*Hand Delivered  
12/10/03*

Dear Ms. Knutson,

RELIABILITY.

**28-1** The EIS must make it unequivocally clear to the reader that underground 120 kV solid dielectric cable facilities for each and every alternative would provide more reliable power delivery than overhead facilities. Period. These, like the underground distribution systems built the same way, represent a substantial technological advance over traditional overhead powerlines.

**28-1**  
Comment noted.

**28-2** Table A-1 confuses the issue by not listing the relative frequency of each failure type. It does not include one of the most common sources of overhead failure:- wildfires and smoke. These are often caused by the lines themselves, as arching and attempts to reenergize faulted lines can readily ignite combustible materials in the area.

**28-2**  
Fire and smoke have been added to Table A-1.

The Table must also include statistics on (older) underground systems that utilize less advanced technology than is proposed with this project. This is apparent when the chart says there is "slower", "weeks" and "none" under "Time to Address Failure" categories and the project description under Cable Dust Bank System two paragraphs down describes capacity for both emergency repairs and immediate fault location (the extra conduit for communication).

Maybe you should just dump the Table.

**28-3** Furthermore, the EIS should include the information that Underground electric facilities are not only more reliable than overhead, but underground electric facilities of any size pose less of a hazard to the public than other utilities (always) installed underground in the same environments, like pressurized gas lines or long distance fuel lines.

**28-3**  
Comment noted.

Sincerely,

*Lori*  
Lori Burke

## Comments

## Responses

December 4, 2003

### Letter

29 Tracy- Silver Lake DEIS responses  
from Lori Burke  
275 Hill St. Ste 302  
Reno, Nevada 89501  
Dear Ms. Knutson,

*Hand Delivered  
12/10/03*

In the RUCR (Regional Utility Corridor Report) there is no implication or suggestion that placing new transmission lines in distribution easements is an acceptable routing strategy, or results in a reduction of impacts from new transmission projects. Distribution easements are ubiquitous. They are required and granted for the purpose of providing limited service within an area and to enhance direct access to best provide for service connections. The fact that they are distinguished as distribution ROW's, and are limited in size to accommodate only distribution lines is intentional and desirable. It was the collective conclusion of the RUCR Committee that distribution ROW's, unless they were already incorporated within or adjacent to a transmission corridor, not be considered a preferred locations or even a specific "locator" for adding transmission.

29-1

Citing particularly RUCR policy 2.3.6.4 (DEIS p 3-28 ). and RUCR 2.3.5.2 (DEIS 4-3), the clear implication in the DEIS is that routing a new transmission line in distribution easements is comparable to, compatible with or "impact neutralizing" (emphasis is mine)". This is found throughout: beginning on S-1, paragraph seven, codified in table 4-2 and p 4-2 through 4-6, ignored in table 3-2 p.3-2 . It subsumes a conclusion on page 4-71 about mitigation.. The maps equate distribution with transmission lines by not showing if it is transmission or distribution lines that are being incorporated into the new facilities. However, policy RUCR 2.3.5.2 encouraging intensive use relates only to existing transmission corridors. The absence of any reference to "existing distribution lines" in RUCR 2.3.6.4 is both significant and intentional. In fact the conversion of distribution ROW to transmission corridor would result in a significant negative impact on segments of the proposed and alternative alignments, whether or not some specific landowners were compensated.

29-2

Transmission lines introduce a dominant industrial element into the landscape. They create a long term liability associated with expansion of the facility and the corridor. They require large ROW's, setbacks and constrain property uses above and beyond what is incorporated in normal set back requirements and development codes. In fact many development codes and other regulations specifically seek to eliminate new overhead lines entirely by requiring distribution and service lines to be placed underground. All of these constitute a substantial negative impact in areas dominated by sensitive land use, most obviously residential, recreational and Open Space.

29-3

While the draft Proposed Project description (p. 2-4) and Alternatives to the Proposed Action (p. 2-11) does indicate portions of the project that track distribution lines, the full text of the Final EIS should acknowledge the impact associated with transmission lines v distribution and differentiate between the two on the maps, charts and assessments on the proposed and alternative alignments. This will enhance awareness of where conflicts are most likely to occur and encourage an informed discussion.

Lori Burke

*Lori Burke*

29-1

Comment noted.

29-2

A map delineating existing transmission lines versus distribution lines has been added to Chapter 2.

29-3

Refer to Response 27-2.

## Comments

## Responses

**Letter**  
**30** December 11, 2003  
Tracy- Silver Lake DEIS responses  
from Lori Burke  
275 Hill St. Ste 302  
Reno, Nevada 89501

*Hand Delivered  
12/10/03*

Dear Ms. Knutson,

**30-1** The value of requirements designed to eliminate or reduce negative visual and public safety impacts from overhead distribution lines will be undermined if transmission structures are added or incorporated in distribution easements or ROW' in the area. Furthermore, people who have already invested in underground facilities will rightly argue that their investment will be

**30-2** compromised if bigger, taller, poles and more powerlines are added in immediate or connected environments.

**30-3** The EIS should acknowledge any development codes, area plans and or CC and R's that require or specifically encourage undergrounding anywhere along the proposed and alternate alignments.

**30-4** The EIS should also note that underground facilities are safer from a fire prevention standpoint in rural low, medium and high density areas, and the BLM, along with other agencies, aggressively promotes underground facilities.

**30-5** The value of homes and surrounding residential lots in Washoe County environments have plummeted when new transmission lines were built. This occurred when the Alturas Intertie was built, when the Tracy- North Valley Road project was built, and was avoided by undergrounding the 120 kV between North Valley Road and the Rusty Spike Substation in downtown Reno. Homes adjacent to the Alturas Intertie route that Sierra Pacific bought as a result of a legal settlement resold on the open market for an average of one quarter less than price they were appraised at before the transmission line was built. These homes were served by existing overhead distribution lines. They included custom homes on one to more than 10 acres. In many cases, the powerline itself was not even located on the property. Contrary to the theory advanced on p.4-71, bottom left paragraph of the DEIS, putting transmission lines in these environments results insignificant and cumulative negative effects.

*Lori Burke*

Lori Burke

**30-1**  
Comment noted.

**30-2**  
Comment noted.

**30-3**  
Comment noted.

**30-4**  
Information has been added to Appendix A, Table A-1 to highlight difference of fire with underground and overhead structures.

**30-5**  
Comment noted.

## Comments

## Responses

**Letter  
31**

December 9, 2003

Tracy- Silver Lake DEIS responses  
from Lori Burke  
275 Hill St. Ste 302  
Reno, Nevada 89501

*Hand Delivered  
12/10/03*

Dear Ms. Knutson,

**31-1**

The proposed Stead Airport Substation should not be incorporated in the project and should not be used as a routing constraint. The **purpose** of the Tracy Silver Lake Transmission Project, i.e., "Connect a new substation in Spanish Springs area to the Silver Lake Substation in Stead to provide for backup to each other in the event of certain outage contingencies" does not necessitate a new substation in the Stead area..

**31-1**

Refer to response 15-1.

**31-2**

The "need" for the Stead Airport Substation (DEIS p. 1-4) as a project component is speculative and unsupported. The DEIS provides no references, data or independent analysis to justify the size and site of the Stead Airport 120kV substation. The ECI (Electrical Consultants, Inc.) 2003 Report ( DEIS p. 2-28) was used to develop parameters for locating a Sugarloaf substation in Spanish Springs. No comparable analysis has been done for Stead, although the facilities proposed are identical. A plan for "industrial development" in any one area cannot be used to site a 120 kV substation. "Industrial development" does not demonstrate the need for 120kV service. Reliable service from lower voltage lines is less expensive to build and provides more direct benefit to those who pay for it. (professional journal IEEE 1994 "Seattle City Lights"). The existing ratepayer base should not be required to fund, build and mitigate for a need that may not materialize (Rule 9 of the Public Utilities Commission of Nevada.).

**31-2**

Refer to response 15-1.

Other information in the DEIS supports eliminating this as a project component. The proximity of 120 kV transmission sized poles and lines to the fly zones and runway (s) (DEIS 3-35) and the necessity of circumventing the airport again and again to access the built out substation described in DEIS (p. 2-7) clearly contraindicates this location. An independent analysis would show that it increases distances, service and mitigation costs for more likely developments. The discussion on page 2-28 for the "Pah Rah Substation Location (s)" is applicable to the proposed Stead Airport Substation site.

**31-3**

Upgrading the existing Silver Lake Substation has been added to Chapter 2 of the document under the "Alternatives Considered but Eliminated" section.

**31-3**

The also DEIS neglects to accurately detail existing facilities, or include pertinent information that could lead to reasonable modification of the project to mitigate impacts. The information on page 2-27 does not include all of the existing subs in the Stead area . It does not evaluate their combined capacity or potential to serve new or growing Stead and North Valley loads including industrial development and intensified land use associated with the Joint Corridor Plan. Both these existing substations are located within and adjacent to growth areas. The Stead Substation is located in an industrial area with expansion space both readily available and fully compatible with existing land uses. The Silver Lake Substation is next to the backside of a large distribution center and is surrounded by vacant land. The space can accommodate a 120kV termination and transformer facility built like the Rusty Spike Substation. They both can house underground and

## Comments

overhead distribution feeders to serve new development and cumulatively minimize distance and long term impact.

31-4

The North Valley Alliance Alternative uses a pad mounted transition of a 120kV underground transmission line at Stead and underground compatible 120 kV transformers at Silver Lake. Fencing and landscaping like the 120kV Rusty Spike Substation in Reno is proposed. This type of substation, rather than the chainlink and barbed wire monstrosity described in the DEIS on page 2-7, would be more compatible with the La Posada substation location (DEIS p. 2-26). It could also offer a place to pad mount some of the existing overhead appurtenances on the right edge of the photo to reduce the overall visual clutter. It should be included in the EIS and in the simulation.

Lori Burke

Enclosures:

Photos Silver Lake Substation and surrounds (2)

Stead Substation (2)

Rusty Spike Substation (2)

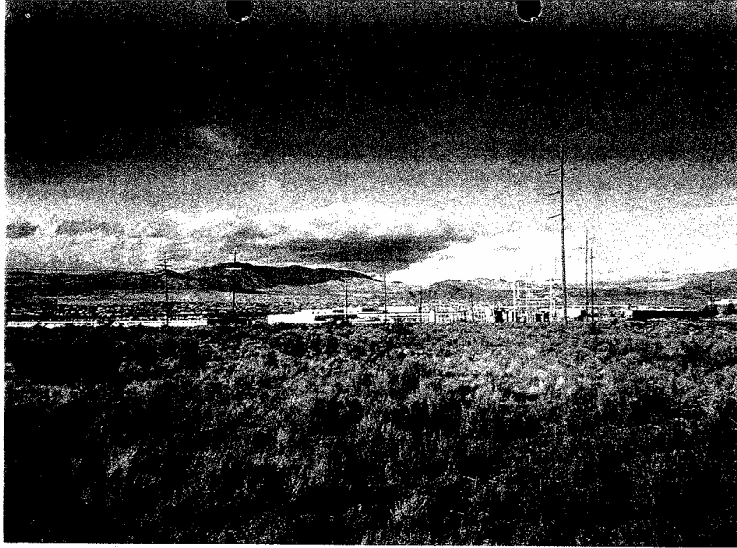
## Responses

31-4

Refer to response 11-1. The proposed action has been revised so that a wall would be constructed.

Responses

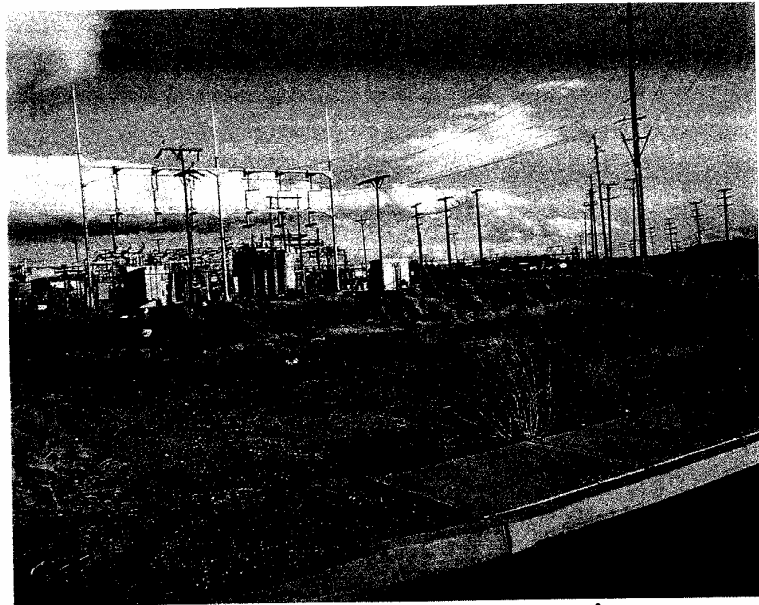
Comments



Silver Lake/Pennys Substation at Stead 180'x230'

## Responses

## Comments



## Comments

## Responses

**Letter 32** November 12, 2003  
Tracy- Silver Lake DEIS responses  
from Lori Burke  
275 Hill St. Ste 302  
Reno, Nevada 89501

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Comment One re: facility expansion in corridors

It can be detrimental to the process to allow the Company (Sierra Pacific) to respond to the Public's questions during the CAB or NAB meetings unless the BLM representative actively participates in responding to each question. If the BLM listens to the Company's response and does not offer an agency perspective, the BLM is giving tacit approval to the accuracy and completeness of the to the information offered by the Company. Based on this, the questioner may come to the mistaken conclusion that an accommodation to a concern may have been effected (or will be) effected without further participation on their part. A case in point was Will Brown's question at the Spanish Springs CAB on November 11, 2003.

Mr. Brown asked if there was any way that Sierra Pacific could be held (in perpetuity?) to the single line proposed with this project. He stated a common concern that approval of a project would establish a ROW (right - of- way) or corridor that could be expanded. Mr. Roulais of Sierra Pacific responded that The Company wanted to be held to a single overhead line (in the east west portions of the various alignments). He said the Company was asking that portions not be considered a corridor and that he had been authorized by his bosses to sign anything with anybody to effect that objective. Based on this, Mr. Brown may have thought it likely that people next to the alternative ultimately selected could eliminate the potential for future powerline expansion simply by having Sierra Pacific sign things with private landowners and/ or with the numerous public agencies that manage ROWs where the facilities are constructed.

**32-1** At the least, the BLM should have taken the opportunity to explain to Mr. Brown that "signing something" with the Company would not afford any such protection on portions of alternatives utilizing BLM ROW. A BLM permit to construct a facility in a ROW does not give Sierra Pacific any control over any other uses or users of the ROW. ( This is explained in a limited fashion on page 1-4, paragraph 6, DEIS.) As I understand BLM process, limiting the use of a federal ROW to a single user for a single transmission line project could not be accomplished under this application or EIS process, no matter what Sierra Pacific is willing to sign.

**32-2** The Corridor Report states that once constructed and operational a 120Kv transmission line is a corridor: a place to locate future compatible linear facilities. This is unambiguous, and is consistent with the policies followed by other regulatory agencies involved in planning and permitting linear utility facilities. To segment an alignment into corridor and "non corridor" parts would destroy the value of the whole alignment, since usable segments would no longer connect to provide a continuous pathway. In order to preserve the value of a corridor as a resource, mitigation is allowed to lessen land use conflicts along sensitive segments of an alignment. Mitigation does not include disallowing future use of parts of a corridor.

**32-1**  
Comment noted.

**32-2**  
Comment noted.



## Comments

## Responses

32-2  
Cont'd

The corridor committee considered this issue and determined that even deed restrictions on individual parcels (the most immutable action we could come up with) could not offer any protection against utility expansion, whether a transmission facility was on a corridor or not. Utility Companies can and do condemn property to create a linear path by invoking imminent domain.

32-3

Regarding Mr. Brown's question and the EIS process, the document should incorporate a more direct response to Mr. Brown's question. The DEIS explanation on 1-9 should clarify the inherent action of establishing a corridor with completion of a transmission facility (paragraph 7).

32-4

Paragraph 3, pg 2-2 should be deleted since it is immaterial and may lead a reader to assume that there is a way to stop any expansion on parts of this facility by dealing with the Company. Also, the specific portions of the proposed project alternatives Mr. Roulais referred to at the Spanish Springs CAB (11-12-03), that the Company believes should become corridors should be shown on a map. In any case, the EIS should document as a connected action the additional facilities the Company apparently anticipates on the eastern north-south portions of the proposed project

32-5

Based on my experience with the utility corridor committee and my involvement with several other transmission routing projects of various voltages, any facility constructed with this project would be logically be the first place to look to expand in the future. If it isn't deemed necessary to mitigate land use conflicts with the lines by burying them with this project, it will be almost impossible to make the case later to get expanded facilities buried.

*Don Burke*

32-3

Refer to response 10-1.

32-4

This paragraph acknowledges that there is a process for designating a transmission line route as a utility corridor.

32-5

Comment noted.

## Comments

## Responses

<b>Letter</b>	December 13
<b>33</b>	Tracy- Silver Lake DEIS responses from Lori Burke 275 Hill St. Ste 302 Reno, Nevada 89501
	Dear Ms. Knutson,
<b>33-1</b>	<b>We have briefly discussed that North Valley residents are not inclined to accept all the assertions made by Sierra Pacific regarding the need for the Project. A more accurate and independent analysis of the purpose and need for project components effecting North Valleys must be prepared for the Final EIS. A study comparable to the ECI Sugarloaf Substation study if a new substation is sited in Stead and a study justifying a project from Tracy to Stead as opposed to Bordertown to Stead should be conducted. What is found in the draft is inadequate.</b>
<b>33-2</b>	Page 1-4 describes a 120 and 60kV loop that exists in Stead (Silver Lake) to serve the North Valleys. The Tracy-Sugarloaf Silver Lake line is proposed to reinforce this Stead service loop by bringing 120kV power from Tracy via Sugarloaf.. According to the Alturas Intertie FEIS the Bordertown Substation was sited to provide future transmission services (reinforcement) to the Stead- North Valley area rather than Tracy (Alturas FEIS A-25, A-29 , and many, many other places). This was advanced as environmentally and economically superior to alternatives coming from Tracy.
<b>33-3</b>	The treatment of the Bordertown substation in the Tracy-Silver Lake DEIS (p.2-27) as an alternative "considered but eliminated" is not credible. In addition to including the fact that Bordertown was sited for the North Valleys, the EIS must state that the 345kV Bordertown Substation is an eleven acre substation. There are no space constraints for siting new facilities. The statement that it is "not set up" to provide 120kV is misleading and should be deleted. "Set up" occurs when the components are added - not before. The EIS must identify that use of a 345 kV line to back up a variety of looped and integrated 120 kV lines is a key component of Sierra Pacific's system in the Central District, clearly evidenced by the Mira Loma Substation. The six million dollars cited as a cost premium does not identify what this is added to. (Please see my comments regarding the cost premium added to the existing corridor alternative.) The distance between the east end of the Bordertown Substation and Silver Lake Substation must be recalculated and put into context by providing an accurate distance between Silver Lake and both proposed Sugarloaf substation locations, less the proposed Airport Substation. "Fifteen miles" from Bordertown Substation to Silver Lake appears to be an exaggeration according to the maps supplied by Sierra Pacific to the RUCR Committee and information in the Alturas FEIS.
<b>33-4</b>	The statement that the 120 kV Stead-Tracy-Silver Lake loop is necessary for Sugarloaf backup has no support in the technical analysis. The existing Spanish Spring 120kV substation and the proposed Tracy-Sugarloaf 120 kV Substation are connected by reinforced distribution. This creates a reliable loop per the ECI 2002 Study. In the DEIS discussion p. 1-4, add that the ECI 2002 report does <u>not</u> discuss looping the 120 kV to any other locations including Silver Lake because the scope of the study was specifically limited to a 120 from Tracy to Sugar Loaf. During

**33-1**  
Refer to response 15-1.

**33-2**  
Refer to response 11-4.

**33-3**  
Refer to response 11-4.

**33-4**  
Comment noted.

## Comments

## Responses

33-4  
Cont'd

the study, Sierra Pacific did not provide information requested by the preparers about any loads or facilities in Sierra's distribution or transmission system outside of northern Spanish Springs..(ECI 2002 Data Request #5). According to ECI, this information is needed to do effective planning . The subsequent ECI Report, p. 2-2, paragraph 3 making reference to Silver Lake is not supported by any more systems information than was provided regarding two Spanish Springs feeders for the first study (ECI 2003 Table 3-10). Absent a new study considering the placement and capacities of related components in Sierra Pacific's system, acknowledge that the purported need of a 120 kV looping to Silver Lake has not been confirmed by independent analysis.

33-5

On Page 1-3, and elsewhere in the document where conclusions appear regarding "need" for facilities in Stead, include the caveats in the ECI Electrical Systems Study page 1, "It should be noted that BLM requirements of the Scope of Work specified that ECI Should not comment on planning decisions including a determination to extend the 120kV system from Tracy to Sugarloaf.... and was specifically limited to distribution systems serving the north and eastern portions of the Spanish Springs service territory. As a result... ECI's ability to utilize value engineering or to consider alternate improvements was limited to some degree.

This should clarify that no independent studies were done that found a weakness or reasonably projected one in the distribution or "power delivery" (transmission ) infrastructure at Stead.

Lori Burke.

33-5

The purpose of the ECI report was to address concerns raised during public scoping regarding the timing and location of the Sugarloaf substation.

## Comments

## Responses

### Letter

December 14

34 Tracy- Silver Lake DEIS responses  
from Lori Burke  
275 Hill St. Ste 302  
Reno, Nevada 89501

Dear Ms. Knutson,

Table 4-31, conclusion re: "Reasonably Foreseeable Future Actions"

34-1

Considering the number of agencies and private parties that have proprietary, regulatory operational and financial interests in the transmission line being built and/ or interconnected with this project, any conclusion assuming that pressure to expand these facilities won't be a constant is naive. The BLM, the Federal Energy Regulatory Commission, the California and Nevada Public Utilities Commissions, the Western Systems Coordinating Council, the Department of Energy, Sierra Pacific shareholders, ratepayers and customers with power contracts could individually or collectively have legitimate authority to direct actions to expand this facility, "corridor" or not. As the energy market rebounds and the companies that participate in transmission like Sierra Pacific are resurrected, a reasonable supposition is that expansion of facilities to effect power transfers will increase.

Most of the proposed and alternative Tracy to Silver Lake Project alignments would change miles of low voltage distribution easements in residential neighborhoods into high voltage transmission corridors encumbered with high voltage transmission lines. Once changed to transmission, the idea that the new "corridor would not be suited" to higher voltage transmission lines is ridiculous. What specifically remains, once distribution lines are converted to transmission lines and corridors, to impede adding transmission including higher voltage lines? Also, isn't expansion of these more likely than (another) new transmission corridor routed from scratch?

34-2

Please change Table 4-31 to indicate that new transmission ROW's or corridors created with this project will become the likely site of future expansion to accommodate all transmission voltages and services, fueled by both need and market conditions.

Lori Burke

34-1

Refer to response 10-1.

34-2

Table 43-1 has been revised to state, "The Tracy to Silver Lake corridor **could** become a designated regional utility corridor...and other utilities or expanded electrical service **could** be encouraged."

## Comments

### Letter 35

Tracy-Silver Lake DEIS responses  
from Lori Burke  
275 Hill St. Ste 302  
Reno, Nevada 89501

Dear Ms. Knutson,

This is a typed copy of the comments I submitted by fax on November 25, 2003 along with some photographs demonstrating the points made.

35-1

Regarding DEIS KOP figure F1b: the wrong pole is pictured here. This appears to be an angle/corner point, have underhung distribution and a transformer. Enclosed, please find a photo of a similar corner pole located on wood pole along an existing 120 kV Sierra Pacific line. Note the substantial tilt in the line that is created with the use of wood poles at corners and with underhangs and transformers. A more accurate pole to superimpose would be the pole pictured on the last page of the DEIS, Appendix A, minus the specific transition laterals, but with angle tension arms and appurtenances plus underhangs for distribution, transformers, phone and cable added. These are the grossly obtrusive self supporting steel angle poles on concrete foundations referred to in the text (DEIS p. 2-6). They are thick and bulky looking with bases commonly three or more feet in diameter.

35-2

Representations of steel poles should also be included in the text of the FEIS. Steel poles would likely be used frequently in the most westerly 11 miles of the project. Photos and drawings should include scale and the variety of attachments that maintain wire tension, transition to underground distribution, deflect or attract birds, hold up the trash cans in the sky (overhead transformers) and / or add height or crossbars to carry the shield wire or other lines.

35-3

The identical drawings in the DEIS figures A-1 and 2-3 are of a single wood pole. None of the other wood pole configurations (double dead end structures, running angle structures) that would be part of this facility are shown. Nor is the wire or all underhangs and additional distribution accessories shown. Please correct this. In any case, wood poles could be used consistently only east of Sparks.

Lori Burke

35-4

Enclosures:  
Photo of a steel angle pole located near Valley Road and Timber Way. This photo of the 120 kV overhead to underground transition structure found in Appendix A shows the environment it is located in. Considering this setting, no effort to mitigate the visual character of the structure was made. In more sensitive settings, transition structures can be pad mounted rather than pole mounted for about the same cost. (See comments dated December 9, 2003).

Photos of the 120 kV line, "Penny's Tap", at the west end of Hoge Road.

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## Responses

35-1

The Pole pictured in figure F1b is the correct pole that Sierra would place at that location. Pictures of typical steel angled poles have, however, been added to the document under Chapter 2, to give the reader a sense of what each type of steel angled pole looks like.

35-2

Refer to response 33-1.

35-3

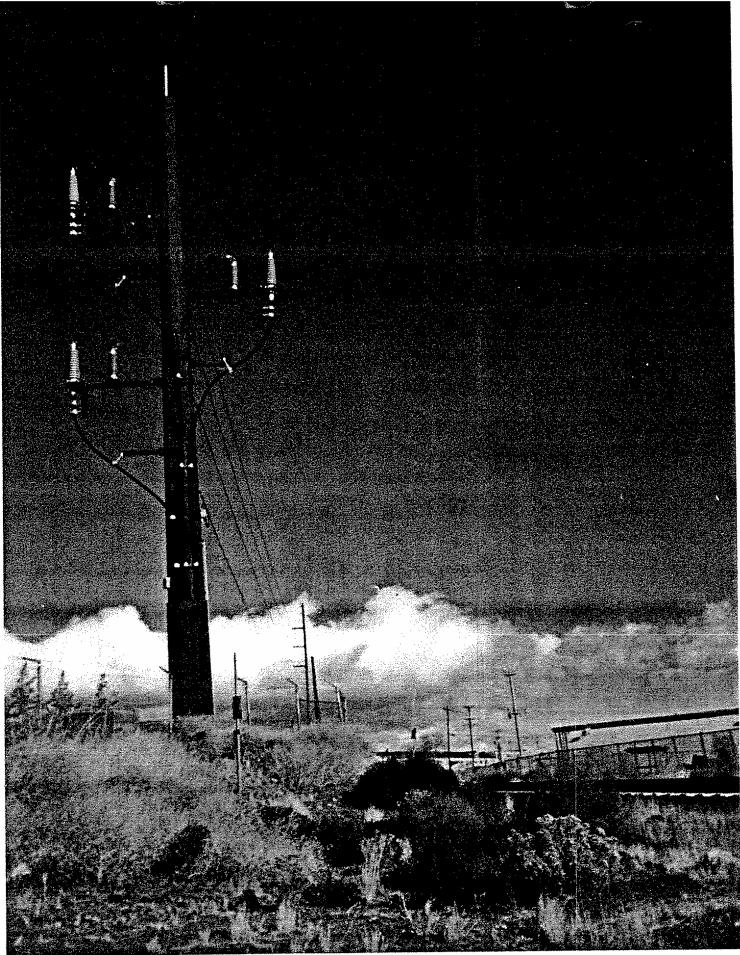
The KOP simulations in Appendix F show the proposed poles with lines and accessories.

35-4

Comment noted.

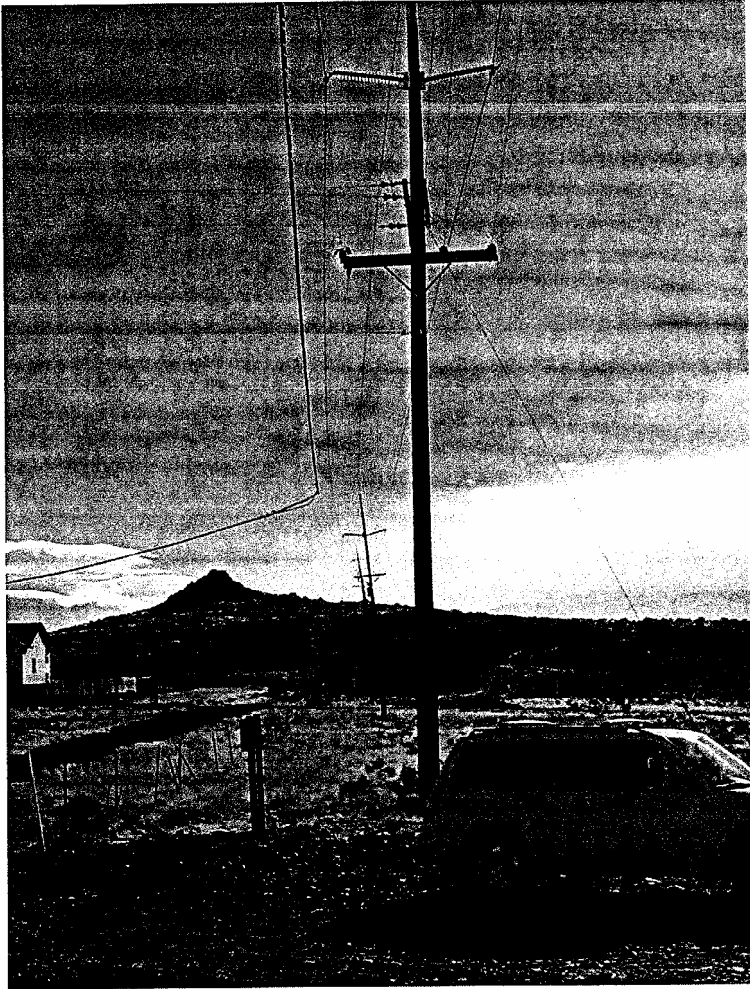
Responses

Comments



Responses

Comments



Responses

Comments





## Comments

## Responses

### Letter

36

Tracy-Silver Lake DEIS responses  
from Lori Burke  
275 Hill St. Ste 302  
Reno, Nevada 89501

Dear Ms. Knutson,

Thank you for the Reports I requested earlier; Electrical Consultants Inc (ECI) "Electrical Systems Study for the Spanish Springs Area" 2002, and "Load Center and Transmission Cost Study For Sierra Pacific Power Company Spanish Springs Service Area " 2003.

The ECI 2002 was prepared when the Coalition, Community Friendly Power Facilities, successfully challenged many of Sierra Pacific's assertions and figures in the 1999 Tracy-Sugarloaf application"(Washoe County SPW4-15-99 and BLM 2800 NV033, filed April 23, 1999). Although the 1999 application was withdrawn by the Company in May 2000, the project described in the current application is essentially the same. Rather than address the issues raised and consider the alternatives proposed in response to the original application, Sierra Pacific has used ECI to provide a rational for a single action. The entire report is constrained by system operational study parameters and the limited data supplied to ECI staff that it is non responsive to the questions and suggestions of the Coalition and the public who had participated in the process for the earlier application. (Please see ECI Electrical Systems Study for the Spanish Springs Area" 2002 section 1.0, paragraph 2 and final sentence of paragraph 3; section 2.0 "Executive Summary" italicized portion; Nov 5, 2001 data request from ECI to Sierra Pacific, question #5 and response.)

36-1

In response to the initial application, Coalition members collected information on the Project and documented impacts. They participated in all public processes related to the Project. Furthermore, EnergySource, a private electrical engineering consulting firm, was hired to review the Coalition's work, respond to technical issues and write authoritative informational position papers on pertinent issues. No energy project in Northern Nevada has been built in the past 50 years without the key professional involvement of one or more of the principals of EnergySource. Their credentials are impeccable and their familiarity with the workings of Sierra Pacific's transmission and distribution systems was invaluable. Withdrawing the 1999 application and submitting the current one should not eliminate the full scope of information developed for essentially the same project, particularly considering the quality of input generated. The alternatives developed should have been carried over and evaluated in the new process.

36-2

Regarding the ECI "Load Center and Transmission Cost Study" 2003, thank you for having ECI address this point. Where the load center in Spanish Springs was actually going to develop was at issue during the 1999 process. For your information, the projected load center ECI pinpoints in this study is within one half mile of what the Coalition and their experts determined would be the load center. Sierra Pacific, however, insisted that the projected load center would be at the site of the proposed Sugarloaf Substation. Sierra Pacific was two and a half miles off the mark.

36-3

I spoke to you informally about the exaggerated per mile cost of solid dialectic cable underground 120 kV installation in table 2-1 of the DEIS; \$1,685,000. This is more than the industry standard

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36-1

Comment noted. The BLM and the cooperating agencies conducted an extensive internal and public scoping process to develop a full range of viable alternatives. In addition, the BLM and cooperating agencies developed an evaluation criteria to determine if alternatives were reasonable for consideration in the DEIS. Refer to Chapter 2 under the "Alternatives to the Proposed Action" section.

36-2

Comment noted.

36-3

The ECI report represents the absolute conservative representation of the cost of undergrounding transmission lines per 3 mile section. As stated in the DEIS, the report was produced as a result of an independent analysis directed by and provided for the BLM for this project, not Sierra Pacific Power Company.

## Comments

- 36-3 cont'd** | for underground construction in comparable environments and is certainly more than Sierra Pacific ever paid; the per mile cost of the underground South Reno 120 kV was \$1,161,163.00 and the Downtown Rusty Spike 120 kV was \$1,144,214, per actual cost figures obtained by the Coalition. Careful reading of the ECI 2003 report shows the underground cost figure in the DEIS was inflated at Sierra Pacific's instructions. In section 4.1 page 4-2 bullet3, the Consultants noted that the best place to install underground cables would be on the shoulder of the road. However Sierra Pacific insisted a four foot road cut for a two foot trench along the entire estimate length (three miles) be added to the construction cost, *and* a substantial road cut penalty. This added more than half a million dollars.
- 36-4** | Please find enclosed photographs taken from the southeast corner of the of the Silver Lake Substation toward the existing Alturas Intertie corridor (North Valley Alliance alternative), the La Posada area and the Spanish Springs Highway. Please refer also to DEIS KOP 3,7, and 8 and map Figure 4-1. Based on the fact that the relevant exhibits show absolutely need to cut pavement, recalculate the entire underground cost and resulting estimate without road cut expense and penalty. Furthermore, independently verify that the \$23.00 linear foot cost of the cable is not just the top of a price range. If it is, please reduce the estimate from \$23.00 to the \$15.00 per linear foot 120 kV cable used in Sierra Pacific's other projects.
- 36-5** | Please readjust the cost of overhead calculated by ECI upward to mesh with the project description. The DEIS page 2-6 "Transmission Line" paragraph 2 refers to the installation of self supporting steel poles on concrete foundations. DEIS maps of the proposed and alternative routes show many places adjacent to roadways and / or around curves where steel poles would be used to negate the need to encumber a large area with guy wires and to support additional appurtenances, whether for a single or double circuit. However the ECI estimate for Overhead 120 kV (ECI 2003 table 4-1) assumes all wood pole construction.
- 36-6** | Industry wide, underground 120kV construction costs approximately four to five times as much as overhead., not the seven shown in the DEIS. The FEIS should reflect this. The text should also indicate that the cost figure in the Draft has been reduced in the Final. Please add as well the following points and include relevant portions in Appendix A:
- 36-7** | Underground electric distribution has become a community and industry standard since the 1970's. Most of Sierra Pacific's current customers and almost every future customer are or will be served by underground facilities. Underground transmission is complementary to underground distribution. It has also become common and has been included on every Sierra Pacific project involving 120 kV in the past ten years (except possibly one.). Sierra Pacific is now using solid dielectric transmission cable in even higher voltages. They recently having completed a 230 kV underground project in Henderson Nevada.
- 36-8** | Underground distribution costs approximately \$400,000-\$500,000 per mile to install (EnergySource, Position Paper #3 dated 7/9/99). Underground transmission installation costs are based on an identical construction scenario, but the actual per mile cost almost triples due to increased cable costs. However, because 120 kV cable has four to five times the capacity of distribution cable, the actual cost per kV is less than distribution.
- 36-9** | The additional cost of underground versus overhead transmission can be off set with the much

## Responses

- 36-4**  
Refer to response 34-3. The BLM contacted ECI Inc. (an independent contractor) on February 26, 2004 and confirmed that the \$23 linear foot cost of underground cable was "close" to their estimated cost.
- 36-5**  
The BLM contacted ECI Inc. (an independent contractor) to determine the estimated price of steel angled poles on February 26, 2004. The estimated total cost is \$40,000-\$60,000 per location; however ECI indicated that a power company would try to design the layout of the final route to avoid the need for these. The 2003 ECI report includes 7 "running angle wood poles" and 3 "dead end angle wood poles, which use guy wires. The running angle poles are used when the angle change is a few degrees. The dead end angle pole is used to handle greater changes in angle, like 90 degrees. These angle poles, however, use guy wires which greatly reduce the costs and allow for use of wood. If they were steel they would be more expensive, but cost less to maintain and last longer. The determination to use wood vs. steel is based on costs and visual aesthetics. SPPC has not indicated how many, if any, of the free standing steel angle poles they would be required to utilize. It is assumed, however, once the final route is chosen, to reduce cost, the least amount of steel angled poles would be utilized and the increase in cost would not be significantly altered from the cost estimate provided by ECI. Refer to response 33-1.
- 36-6**  
Comment noted.
- 36-7**  
The Cost figures identified in the EIS were developed by a third party contractor (ECI) and found to be accurate for use in the EIS.
- 36-8**  
Comment noted.

## Comments

- 36-9 cont'd** narrower ROW that underground requires. The ROW and set back for an overhead 120kV facility absorbs a linear strip at least 125 foot wide. The same line underground has a 15-25 foot ROW and no setback. The development value and potential that is retained with the narrow underground ROW is further enhanced because the since the space is not degraded by overhead lines. Please calculate an example showing the land savings per 3 mile segment of underground and provide a range of development potential retained based on allowable densities along various alignments.
- 36-10**

Lori Burke



Enclosures:

Photograph of La Posada vicinity(2)

Photographs of Pyramid Highway (2)

Photographs of Silver Lake Substation vicinity (2)

## Responses

### 36-9

Refer to DEIS Table 2-3, assumption number 2.

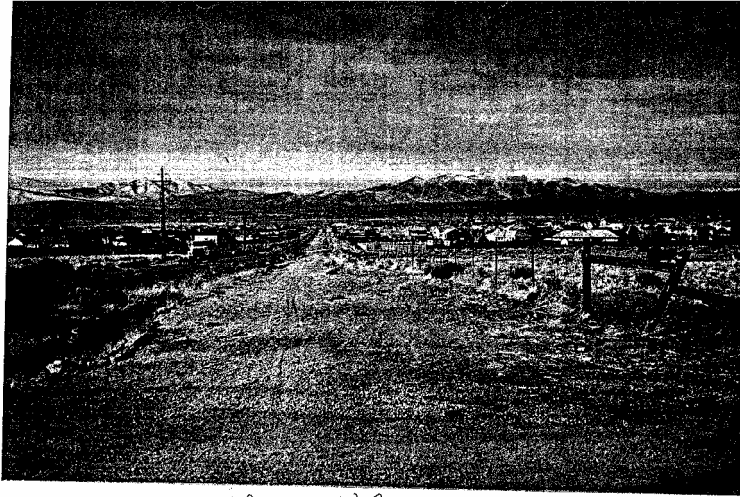
The ROW requested by SPPco to the BLM for the proposed overhead line was 40 feet. On February 26, 2004 the BLM contact ECI Inc. (an independent contractor) and asked what width is required for an underground 120 kV line. ECI answered as such, "It would not be too different. You need to take into account the access road for maintenance as well as provide adequate space for the vault. It may be less, but not significantly less."

### 36-10

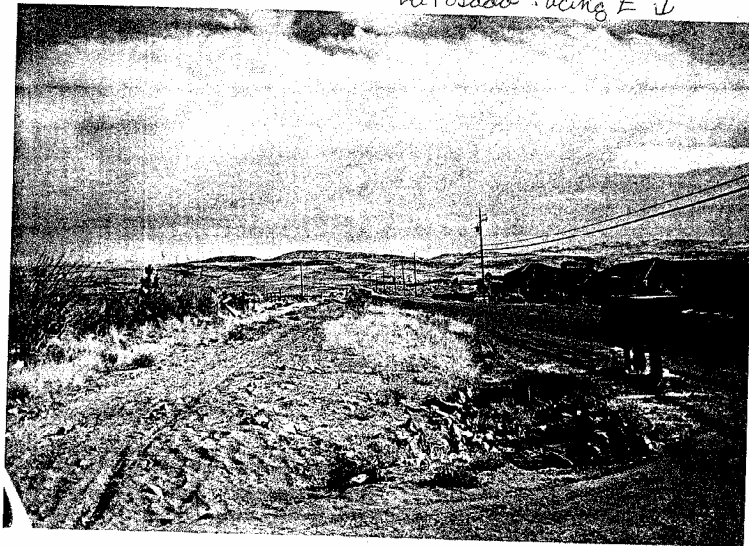
The comment is beyond the scope of the document.

Responses

Comments



La Posada Facing W ↗  
La Posada Facing E ↘

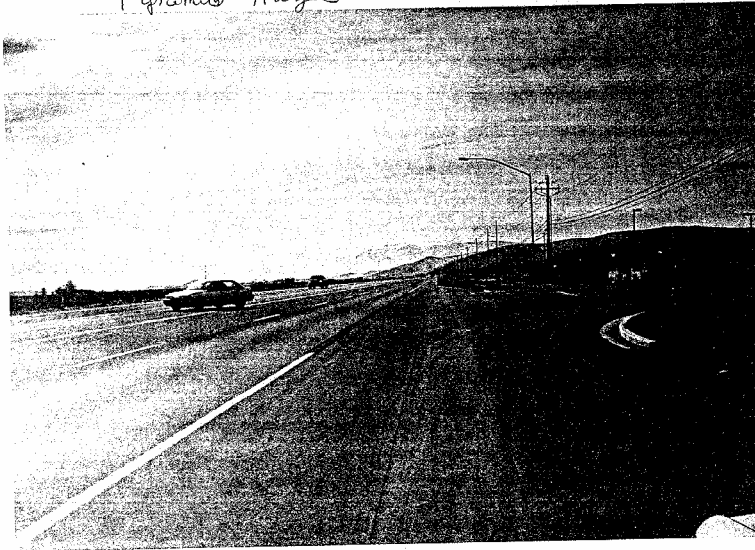


Responses

Comments



Pyramid Hwy S



Responses

Comments



SILVER LAKE SUBSTATION FROM THE SOUTH and Toward 895



## Comments

Letter  
37



DRBILL  
<bavery@telemetry.co  
m>

To: tracysilverlake\_eis@blm.gov  
cc:  
Subject: Draft EIS Tracy-Silver Lake Comments

12/15/2003 08:01 PM

Dear Terri -

Attached is the file containing my comments. I had no way to attach the Appendix items. I also faxed it with Appendix items to you today. I will mail an original with the Appendix items including a better map than the faxed one.

Thank you for all the attention you have given this project.



Lois Avery EIS120Draft.doc

## Responses

## Comments

December 15, 2003

### Comments from Lois Avery on Draft Tracy-Silver Lake Transmission Line Project Environmental Impact Statement

#### 1. Items rectified from first Draft EIS presentation

First I would like to commend the Draft EIS for including several items that I requested in my letter dated August 30, 2002.

- 1.1. Point I. 1) Notification was sent to all property owners within 750' of each possible route.
- 1.2. Point II. 1) All the maps in the draft EIS contained parcel lines.
- 1.3. Point II. 3) Maps in the draft EIS went farther south so the existing corridor to the south showed.
- 1.4. Point II. 4) Load center calculations for Spanish Springs were provided in a separate document available on the BLM web site.
- 1.5. Point IV. 1) The Draft EIS did include a "Existing Corridor" route, though it was not done very cleverly.
- 1.6. Point IV. 4. The number of residences within 150' for each alternative is listed on Table 2-3.

#### 2. Problems with information provided with the Draft EIS

- |      |   |
|------|---|
| 37-1 | 2.1. Table 2-3 Comparison of the Proposed Action and Alternatives needs to separate out the two parts of each route: (a) Tracy to Spanish Springs and (b) Spanish Springs to Stead. That way one can compare combinations of route (a) of one alternative with route (b) of another alternative. For example, there are 52 houses within 150' on the Existing Corridor Alternative: Are they evenly divided between the Tracy to Spanish Springs part and the Spanish springs to Stead, or are there more on the (b) part than the (a) part?  |
| 37-2 | 2.2. On the comparison chart, it would also be nice to know the total number of parcels along the route, or the number of parcels within 750' (these parcels are already known as they received a mailing). The Length of ROW on non-Public Land is useful, but does not indicate the amount of development along those miles.  |
| 37-3 | 2.3. All maps show a dashed line for routes "incorporating existing line." There is no distinction made between distribution lines and existing "Utility Corridors." This distinction is very important since the Utility Corridor Report emphasizes using an existing corridor.  |
| 37-4 | 2.4. The cost for undergrounding was taken from the ECI report. In that report several underlying facts were revealed. They used a 3 mile segment and added in \$198,537 per mile for disturbing and replacing pavement (that is the cost plus the overhead percentages divided by three). To figure actual undergrounding costs, the up-down cost needs to be separated from the actual cost for the line per mile. The pavement cost also needs to be separated out. On La Posada, it would not be necessary to do hardly any pavement work as it is now two lane, but has the easement for a future four lane. |
| 37-5 | 2.5. My point VII in August 2002 letter Proposed Alternative A was not considered. Part of it, using the existing corridor was used in the Existing Corridor alternative, but instead of continuing north on mainly BLM land, it was routed up Pyramid Highway.   |

## Responses

#### 37-1

Tetra Tech has updated table 2-3, now table 2-4 to identify structures within 150 feet of the alternatives within the two phases of the individual routes.

#### 37-2

The number of parcel easements required are provided in table 2-3.

#### 37-3

A map has been produced to display the existing transmission line areas versus the existing distribution line areas, and has been added to Chapter 2. Refer to Figure 1-2 for existing Regional Utility Corridors within the project area.

#### 37-4

Comment noted.

#### 37-5

The Proposed Alternative "Route A" is the same as the Existing Corridor Alternative with the exception of the bit of land along BLM land from the Spanish Springs Substation to the Foothills Alternative to eventually connect with the Proposed Sugarloaf Substation. The purpose of using Pyramid Highway in the Existing Corridor Alternative was to utilize an already disturbed area with an existing distribution line. Proposed Alternative Route A would add another line to an undisturbed area and therefore was not included in this analysis.



## Comments

## Responses

- 37-6 | 2.6. Table A-1 provided by SPP comparing underground and overhead problems does not indicate the frequency of various problems with either kind.
3. Problems with Routes or Data in the Draft EIS
- 37-7 | 3.1. Load Center: The load center calculations did not take into account Sun Valley. If Sun valley is considered, then the Granite Pit Substation is closer to the center. Even now, it is not out of range, but merely at the edge of what is acceptable.
- 37-8 | 3.2. The Draft EIS mentions on page 1-9 the Avoidance principle of the Utility Corridor Report. All of the routes in Spanish Springs ignore that principle and Point IV. 3. of my August 2002 letter about routes on Pyramid Highway not following the Utility Corridor Report:  
"The Report has areas that are to be avoided with new lines. (2.3.1. Avoidance) One of these is the Pyramid Highway. SPP says that the proposed route does not go up the "scenic Corridor" part of Pyramid. However, Pyramid is listed to be avoided because it is one of the "areas of high visual, scenic, social or cultural value" corridor without reference to whether or not it is a scenic corridor. The proposed alternative goes up Pyramid Highway."  
Except for the Northern alternative part of Pyramid, all the other routes use a highly traveled part of Pyramid and will be a visual blight forever unless it is undergrounded. The mistake of putting a large power line on a major highway was made with the Alturas line on 395. It was the disaster to the viewshed caused by the Alturas line that caused this principle to be put in the Utility Corridor Report. Please do not make the same mistake again.
- 37-9 | 3.3. Page 4-56 **Fire Safety** is rated a minor during operation and maintenance. Every year we have fires in our area and other similar areas that are started by power lines. The most typical causes besides poorly maintained equipment that cause arcing are wind and birds catching fire, falling off the line and starting a fire. Recent fires caused by power lines include one of over 800 acres which caused evacuation of 2,300 homes in Colorado in October 2003. "Authorities said they believe both fires were started by power lines downed by high winds..." Locally a quarter acre in Red Rock started in June 2003 "caused when a bird apparently arced the power lines."
- 37-10 | 3.4. **Costs** In figuring costs, remember that the government is now charging the one who causes a fire the firefighting costs. Underground lines do not start fires. There is also the cost to society when power lines are down from wind or ice. Underground lines are not downed by wind or ice. Then there is the value of individual lives that are lost through power line accidents – kites, vehicle accidents and touching of lines with various equipment do not happen with underground lines.
- 37-11 | 3.5. Page 4-59 Calle de la Plata Alternative – **Fire** Calle de la Plata is the only county maintained road that is an exit for over 400 parcels. If the road is blocked by a down power line, there is not access for emergency vehicles or exit for residents in case of fire. This is also true for some parcels north of La Posada and could be true for some parcels south of La Posada. Lines on either La Posada or Calle de la Plata should be undergrounded.
- 37-12 | 3.6. Flood Plain. The route along Calle de la Plata is in a flood plain. There is a flood mitigation project scheduled for Spanish Springs, but it only goes for a short way from Pyramid on Calle de la Plata. Most of the alternative route along

37-6

Table A-1 provides a general frequency of failure comparison of underground vs. overhead transmission lines.

37-7

Comment noted.

37-8

Comment noted.

37-9

Text added to Section 4, Public Health and Safety that discusses the potential for wildfire ignition and SPPCo's actions to minimize wildfires.

37-10

Comment noted.

37-11

Refer to response 35-9.

37-12

Comment noted.

## Comments

## Responses

37-12  
cont'd

Calle de la Plata will still be in flood plain. The current power poles along this route are always having to be shored up. This does not seem to be the wisest choice for a major transmission line.

4. Alternative Route A (see map A) combined with any route from Spanish springs to Stead.  
My previous suggestion was: "Double circuit the existing 120kV line from Tracy to the Spanish Springs Substation. Most of the corridor is wide enough the separate poles could be used to increase separation. This would use 12.3 miles of existing corridor. When the line reaches Vista where the existing 120KV and 345kV are double circuited, the new 120kV line would have to be undergrounded. This could be the full way to the Spanish Springs Sub station: 1.3 miles or possibly to just west of Sparks boulevard. From Spanish Springs Sub it would double circuit the existing 120kV line till west of Pyramid. It would then head north through the ridge between Sun Valley & Spanish Springs."

The Existing corridors Alternative uses part of this route, even finding a way to eliminate the underground part by putting the 120 kV line with a 25 kV line. Underground would be better, but that is a creative alternative. From the EIS it is not possible to tell how many houses are within 150' of this part of the line.

37-13

It differs from the Existing Corridors Alternative when it passes the Spanish Springs Sub Station. Do not put it with the 345kV line and do not run it up Pyramid Highway. Cross Pyramid highway (either as separate line or double circuited with the 120 kV line) then head up on the BLM land between Sun Valley and Pyramid Highway. At the north end of Sun Valley cross two parcels to the BLM land west of Spanish Springs. Then head north, along the Foothills Alternative to the Proposed Sugarloaf Substation.

This route has several important positive elements:

- 4.1.1. It eliminated all conflicts with Pyramid Highway, except for the one crossing in an area where the visual impact is lessened because of the backdrop of the hill. This follows the Utility Corridor Report Principle 1 of Avoidance on page 1-9.
- 4.1.2. It only effect two new parcels, and it should be possible to be more than 150' away from any structures on them. This follows the Utility Corridor Report Principle 2 of Separation on page 1-9.
- 4.1.3. The new parts of this route are almost entirely on public land.
- 4.1.4. The effect on the viewshed is minimal: The new part of the line would have the hills behind it in Spanish Springs (EIS Appendix F Views 9 & 10) and be also sheltered from view on the part running between Sun Valley and Pyramid Highway.
- 4.1.5. This uses 12.3 miles of existing corridor. This follows the Utility Corridor Report by giving priority to use of existing corridors over establishment of new corridors. EIC and the EIS point out that this does not provide as much redundancy as widely separated lines. This is true. However even knowing this would be true whenever lines used the same corridor, both SPP and the governmental agencies which adopted the Utility Corridor Report felt that this would be acceptable. To use lack of redundancy as grounds for not using the existing corridor makes the Utility Corridor Report a farce.

37-13

Refer to response 35-5.

## Comments

5. Other suggestions
- 37-14** | 5.1. Substation – chain link fence. The fence should block view into the substation and be pleasing to look at. Chain link does not fulfill either of those criteria.
- 5.2. Distribution lines from Substations: All Distribution lines from Substations must be required to be underground.
- 37-15** | 5.2.1. The Spanish Springs Area Plan states that all primary and secondary power lines shall be underground.
- 37-16** | 5.2.2. The Sparks Master Plan also encourages the undergrounding of all transmission lines.
- 37-17** | 5.2.3. The North Valley - Stead plan also calls for undergrounding of all power lines.
- 37-18** | 5.3. For reasons stated in 4.3 the 120kV line should be undergrounded along La Posada and Pyramid, or if the Calle de la Plata route is chosen, along it.
- 37-19** | 5.4. At the Open House at the Spanish Springs High School last year, it was proposed that the existing distribution, phone & cable lines could be buried and replaced with the new overhead transmission line, which would be less visually obnoxious than the existing lines. This does not deal with any of the points raised in 1-6, but it is certainly preferable to hanging everything that currently exists below the new 120kV lines. Any 120 kV lines on La Posada and Pyramid that are not underground should follow this method, as it will greatly improve the viewshed.
6. Comments
- 37-20** | 6.1. There is no reason to run a transmission line up Rockwell unless it is underground. Rockwell could be used if it is easier to underground than Pyramid.
- 37-21** | 6.2. The Calle de la Plata Alternative gives the shortest route along Pyramid. If the Calle part and the Pyramid part were underground, it would give the shortest underground in the Spanish Springs area.
- 37-22** | 6.3. See my Appendix 2 for a list of problems with overhead lines compared to underground. SPP Table A-1 also addresses these issues. What is not disclosed is how often the various problems occur. Just because it is easier to fix sewer lines if they are above ground does not mean that that is a better way to run sewer lines.
- 37-23** | 6.4. As society becomes more dependent on electricity, the cost of areas and businesses being without power needs to be figured into the overall cost calculation. Mother nature has caused more power outages this year than ever. Almost all of them could have been avoided with underground lines. Earthquakes affect both overhead and underground, but underground is not affected by most other natural disasters.
- 37-24** | 6.5. The Existing Corridor Alternative was a travesty. It looked like someone wanted to totally discredit the idea. My alternative in Point 4 is much simpler.

Thank you for considering these points.

Lois Avery  
2900 Fantasy Lane  
Sparks NV 89436  
775 425-8000

## Responses

### 37-14

Text has been rewritten in Chapter 2 to describe the outside of the substations as such, “The site would be surrounded by a wall. The site would be finish graded, gravel surfacing would be installed, and disturbed areas would be revegetated. Landscaping would be consistent with the surrounding area.”

### 37-15

The following has been added to the Chapter 3 paragraph before the “Land Use-Proposed Action” section: "The North Valleys, Spanish Springs, Sun Valley, and Truckee Canyon Area Plans, state that utilities such as electrical lines should be placed underground. The Warm Springs Area Plan states that electrical lines should be placed underground to the maximum practicable extent possible (Washoe County 2003a)."

### 37-16

Comment noted.

### 37-17

Refer to response 35-15.

### 37-18

Comment noted.

### 37-19

Comment noted.

### 37-20

Comment noted.

### 37-21

Comment noted.

## Responses

**37-22**

Comment noted.

**37-23**

Comment noted.

**37-24**

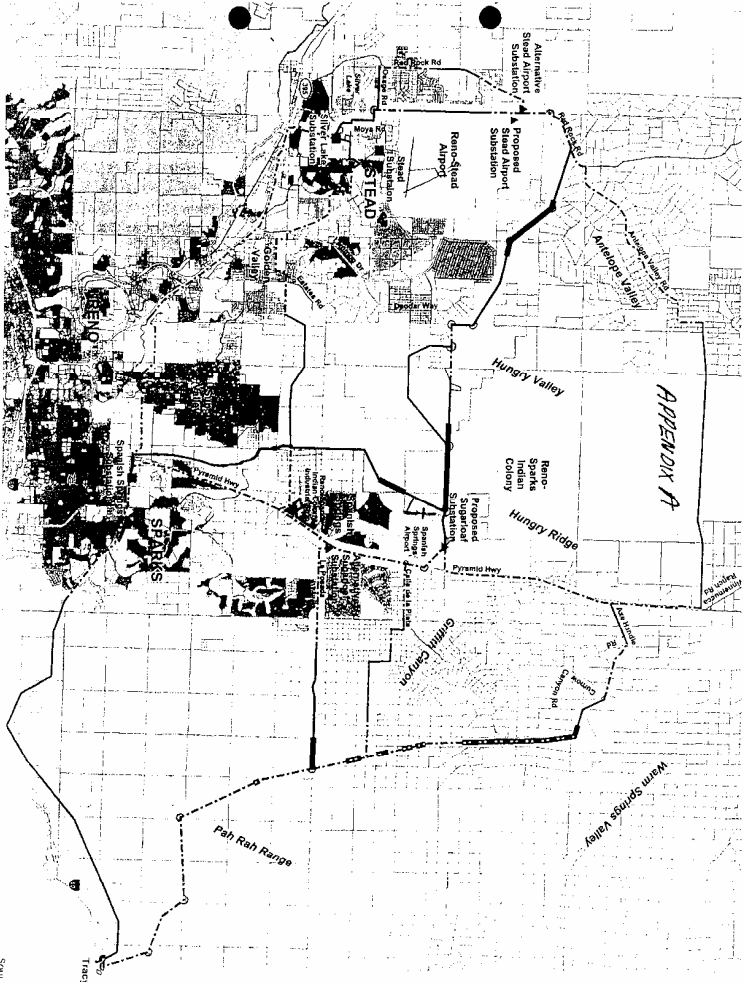
Comment noted.

## Comments

Appendix A Map of Proposed Alternative  
Appendix 2 Underground & Overhead Safety

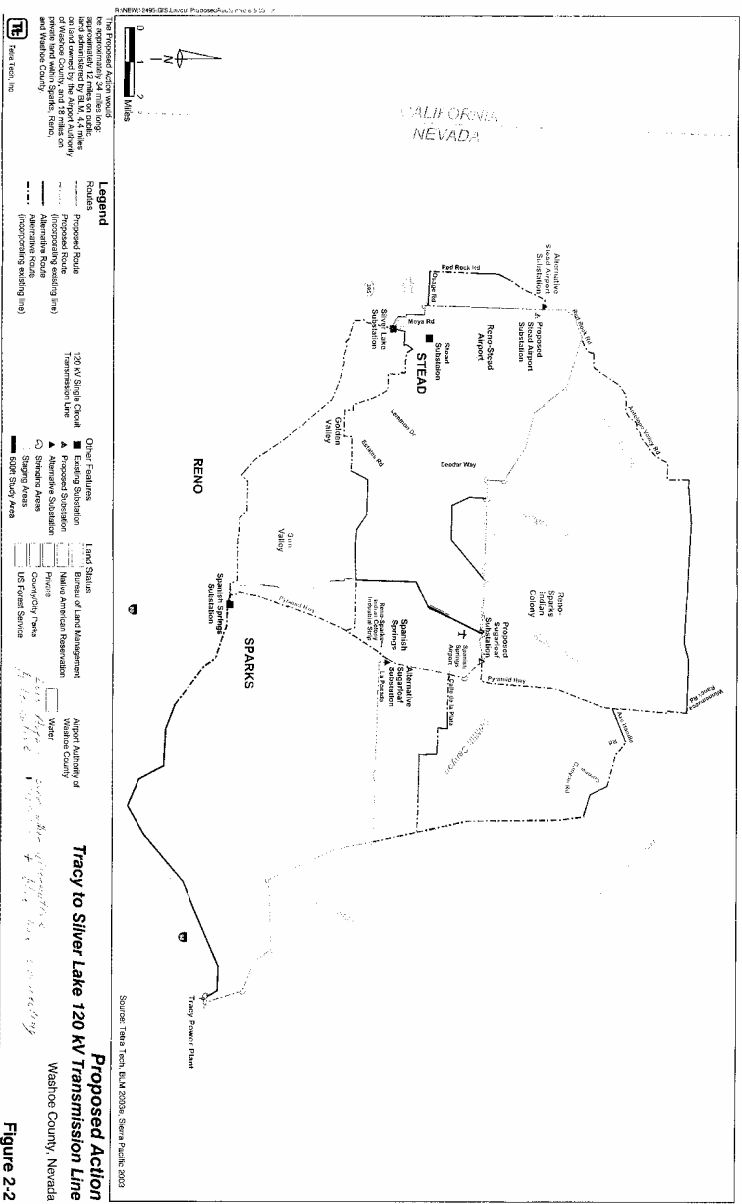
Responses

Comments



## Responses

## Comments



## Comments

## Responses

### *APPENDIX 2*

### **III. SAFETY and POWER OUTAGES Overhead Lines Cause Many More Problems than Underground Lines**

Power outages cause safety problems including:  
     traffic signals not working  
     power equipment stopping unexpectedly  
     elevators stopping  
     security systems not working  
     non-functioning medical equipment

Most of the causes of outages can also start fires or cause electrocution.

### **Table of Contents**

1. "Which Is Safer & More Reliable: Overhead or Underground??"  
Table from Coalition for Community Friendly Power Facilities
2. "Eastern District - Cause of outages"  
Sierra Pacific Power: 1993 State of the Electric System
3. Vandalism: Overhead Lines Are Attractive Nuisance
4. "Winds cause power outages"  
Reno Gazette-Journal September 10, 1999
5. "Dead bird victim of growth"  
Reno Gazette-Journal

Initial installation cost is just one cost that should be considered. Society incurs costs whenever there are fires, electrocutions, or power outages caused by problems with overhead lines. The power company also incurs maintenance costs, fire fighting costs (these are just starting to be billed), and claims for damages.

## Comments

Which Is Safer & More Reliable:  
Overhead or Underground??

Event	Overhead		Underground	
	Safety	Outages	Safety	Outages
Start fire	X	X	0	0
Insulators or connectors arc	X	X	0	0
Bird dies & catches on fire	X	X	0	0
Wires break or spark in wind	X	X	0	0
Lightning hits pole	X	X	0	0
Damaged in fire	X	X	0	0
Damaged by wind	X	X	0	0
Damaged by ice	X	X	0	0
Damaged by snow	X	X	0	0
Lightning	X	X	0	0
People shoot out insulators	X	X	0	0
Kites	X	X	0	0
Pole hit by vehicle	X	X	0	0
Boom trucks or ladders	X	X	0	0
Birds killed	X	X	0	0
Dust collects on insulators	X	X	0	0
Hot Air Balloons	X	X	0	0
Airplanes	X	X	0	0
Trees - clearance from branches	X	X	0	0
Trees - unloading snow	X	X	0	0
Poles fail	X	X	0	0
Wire Slapping	X	X	0	0
Lightning arrester	X	X	0	0
Clearance around wire	X	X	0	0
Vandalism	X	X	0	0
Damage by animals - 120kV	X	X	0	0
Damage by digging	0	0	X	X

## Responses



## Responses

Sierra Pacific Power: 1993 State of the Electric System

Page 64

Eastern District - Cause of outages					1-1-1992 to 6-1-1993
Cause	# Trips	# Customers	Duration	Customer-Hours	
Birds/Animals	117	7,117	155.24	4,245	
Structure Down	19	11,654	127.04	6,627	
Trees	40	10,772	106.15	5,091	
Wire Down	15	2,730	74.68	4,937	
Wire Slapping	38	2,255	67.86	2,630	
Snow Unloading	13	2,606	31.43	3,837	
Pole Fire	25	5,381	162.52	7,661	
Arrester	5	366	12.02	1,632	

Table 29: Eastern District Outages by Cause

## Comments

Power outages cause safety problems including traffic signals not working, power equipment stopping unexpectedly, elevators stopping, security systems not working, and non-functioning medical equipment.

Most of the "causes of outages" listed can also start fires or cause electrocution.

*Underground lines are not affected by any of these problems.*

## Comments

## Responses

### Vandalism Overhead Lines Are Attractive Nuisance

Reno Gazette Journal August 18, 1999  
Insulators used for target practice:  
Can cause power outages and endanger lives

#### Sierra Pacific offers reward for vandal clues

BATTLE MOUNTAIN —  
Sierra Pacific Power Co. is offering a \$1,000 reward for information about the vandals who recently destroyed dozens of power line insulators near here.

Crews discovered about 30 damaged insulators over the weekend on power poles in Lewis Canyon about 10 miles south of here.

They said the vandals were using the insulators for target practice, but were endangering their own lives as well as those of unsuspecting visitors to the area who could have been electrocuted if they came in contact with the downed power lines.

Sierra Pacific Power: 1993 State of the Electric System - Page 64

#### ELKO

A review of the district outage data quickly indicates the need for additional reliability on the Adobe #202 line. Just one outage, caused by vandalism, on this feeder to the Spring Creek area, accounted for 22% of the district's customer outage hours.

One California lineman said that kids in his repair area got their kicks by throwing chains over the wires.

#### Underground Lines Do Not Attract Vandals

Responses

Overhead Power Lines Must Be Required to Have Bird Guards

- Spanish Springs is home to many large birds
- Killed birds can catch on fire, fall to the ground, and start wildfires
- If part of route is overhead and part underground, then the overhead part should be required to have bird guards.
- Without bird guards on power poles, birds are killed. (Photo of dead eagle taken half a mile from proposed power line.)
- Underground power lines do not kill birds.
- 120kV Power lines should be underground in areas with existing homes on 40 acres or less and with proposed homes on 10 acres or less

RENO/SPARKS

ALSO COVERING NORTHERN NEVADA AND THE WEST

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CIRCULATION: 286-8744, CLASSIFIED: 348-7385

MEET NOW/ATCH 2D  
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GET TOGETHER 11D  
D

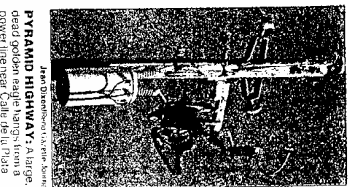
Dead bird victim of growth

Golden eagle electrocuted; Utility does put bird guards on its power poles.

By Jennifer Crowe  
RENO GAZETTE-JOURNAL

A golden eagle electrocuted Thursday after landing on a power line in Spanish Springs is a victim of rapid growth in the Reno-Silverado Valley, residents Linda James spotted the eagle's dead body hanging from a power line on Monday, School it's the second time she's seen a dead golden eagle on a power line in the last two years.

"There must be something they can do to put up some kind of barrier to eagles don't land there," said Chris Healy of the Nevada Division of Wildlife and raptors such as golden eagles, which fly high places of about 10,000 feet, said Linda James spotted the eagle's dead body hanging from a power line on Monday, School it's the second time she's seen a dead golden eagle on a power line in the last two years.



Dead bird hangs from power line near Silverado Valley. Photo by Jennifer Crowe.

Comments

Responses

FRIDAY, SEPTEMBER 10, 1999  
RENO GAZETTE-JOURNAL

Wind knocks out power for

- 10,500 customers (Some for over 4 hours)
- Washoe County Sheriff
- Dept. of Motor Vehicles
- Nevada Mental Health Institute

- Traffic lights

Sierra Pacific spokesman Bob Sagan says,

"The wind is the worst situation. When the winds kick up in the Washoe Valley, the old Washoe zephyr keeps us busy."

Winds over 70 mph occur several times a year in Spanish Springs.

Underground lines are not affected by wind.

# Winds cause power outages

**Washoe zephyr:** Gusts up to 60 mph knock down trees, disrupt power for hour.

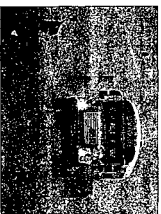
By Karen Miller  
RENO GAZETTE-JOURNAL

Widespread problems knocked out power to about 10,500 customers Thursday afternoon in the Washoe Valley, the Department of Motor Vehicles and Nevada Mental Health Institute.

Power outages darkened the area around the intersection of Fourth Street and Paterson Street.

The worst of the situation was in the Washoe Valley, the old Washoe zephyr kept us busy.

Winds over 70 mph occur several times a year in Spanish Springs. Underground lines are not affected by wind.



**STORMY:** Heavy rain and construction site blows across Main Avenue in Reno Thursday afternoon's windstorm. A water truck arrived a week down the street.



**DAMAGE:** Cedar Canyon, a branch of the city of Sparks, was blown through a backyard fence and onto Shadow Lane road, and other city workers remove branches from the street.

"It was pretty strong what moved through."

Randy Cruz  
Rational Weather Service

## Comments

### Letter

38 December 15, 2003

Terri Knutson, Project Manager  
5665 Morgan Mill Road  
Carson City, NV 89701

Dear Terri:

As a member of the Reno-Sparks Indian Colony, I have serious concerns with the proposed transmission line from Tracy to Silver Lake. Although I am a resident of the Colony's downtown lands, I still frequent Hungry Valley for community and cultural events, and recognize the residents desires to keep as little development as possible from infringing on Hungry Valley.

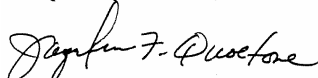
38-1 The greatest concern that I have is with the EIS limiting its analysis to a mere power line, when under local laws, this project will become a designated corridor. The effects that we will experience in Hungry Valley (and for all affected communities) will eventually increase with time, and with the growth in our area. Table 4-31 notes that this is a corridor, and that future decision makers will likely encourage new utilities to confine themselves to this route. Yet, this same table notes that the route is unsuited to larger voltage lines. So why doesn't BLM analyze this as a corridor to include such future developments and find a route that is appropriate for such future developments? Otherwise, we either build a corridor that will have developments unsuitable for the environment, or we will create a new corridor in the future, when only one is needed.

38-2 I also have concerns with the effects that these power lines will have on the visual aesthetics of the Valley, and would recommend slight alterations to the route (if the final route runs through Hungry Valley) so that they are completely out of view from the residential and community areas. Also, BLM should ensure that the chosen route does

38-3 not interfere with Reno-Sparks Indian Colony members' access to cultural and religious sites and events that Hungry Valley accommodates.

38-4 Also, please recognize that Hungry Valley has characteristics that make revegetation difficult, as the current status of the vegetation (or lack thereof) over the Tuscarora Pipeline demonstrates. I would like to know what BLM and Sierra Pacific will do that will more successfully and rapidly replace the vegetation and prevent soil erosion than this earlier project.

Respectfully Submitted,



Jacqueline F. Quoetone

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE  
2003 DEC 16 A 11:08

## Responses

### 38-1

Table 43-1 has been revised to state, "The Tracy to Silver Lake corridor **could** become a designated regional utility corridor...and other utilities or expanded electrical service **could** be encouraged."

### 38-2

Comment noted. Visual impacts are discussed in detail in Chapter 4 under the "Aesthetic Resources and Noise" section. In addition, the Calle de la Plata Alternative added the route dip in Hungry Valley to address any impacts that might affect the view shed from the RSIC.

### 38-3

Comment noted. Impacts to cultural and religious sites are discussed in chapter 4 under the "Cultural Resources and Paleontology" section. The final selected route will take into account the varying degrees of impacts to all resources, including cultural resources.

### 38-4

Comment noted. A Reclamation Plan has been identified in Appendix B.

## Comments

## Responses

Dec. 15, 2003

**Letter**

**39** Ms. Terri Knutson  
EIS Project Manager  
Carson City Field Office  
5665 Morgan Mill Road  
Carson City, NV 89701

RE: Draft Environmental Impact Statement Tracy to Silver Lake Transmission Line Project

Dear Ms. Knutson:

Thank you for the opportunity to comment on the Tracy to Silver Lake Transmission Line Project Draft EIS. Our family appreciates the work you and your agency provides on these projects.

**39-1** Our first concern with this proposal is the transmission line alternatives that use La Posada Drive. Our property line is a little more than 300 yards from this routing and we are concerned about the aesthetics in what we would consider a visually sensitive area. One of the reasons we moved to Spanish Springs Valley 10 years ago was for the open spaces and beautiful Nevada vistas. We feel that the proposed 120-kV line would essentially eliminate a valuable amenity to our home and an important, positive aspect of our lifestyle. We would urge the applicant consider providing underground alternatives in residential areas as suggested by the Spanish Springs Citizens Advisory Board.

**39-2** Another concern regarding the La Posada route is the impact to flood control engineering. Two years ago, a 100-year flood episode proved that the current flood infrastructure was woefully inadequate and in fact may have exacerbated the problem. Even during lesser precipitation episodes the current system cannot handle the water. How would the transmission line and its construction be integrated into the flood control?

**39-1** Comment noted. Visual impacts are discussed in detail in Chapter 4 under the “Aesthetic Resources and Noise” section. The final selected route will take into account the varying degrees of impacts to all resources, including visual resources.

**39-2** SOPs will incorporate all facilities into the Spanish Springs Flood Mitigation Project.

## Comments

### Tracy to Silver Lake Transmission Line Project Draft EIS Comments/Page 2

39-3

This leads to another concern. Throughout the Draft EIS, the project had been analyzed as a power line. However, according to the Washoe County Regional Plan Update, any power line over 60kV becomes a utility corridor. Your Draft EIS acknowledges that the creation of a corridor and notes that other utilities or expanded electrical services would be encouraged. This is very troubling because if La Posada is chosen, it could open the floodgates to countless construction disturbances from utility construction and a poorly constructed road surface that our area's lack of coordination in these matters usually leads to. We would also fear that once this corridor is established it would lead to larger electrical lines and greater impacts. This potential expansion -- due to this "encouragement" -- should receive attention in the EIS.

We hope that these and the comments of other agencies and citizens affected by the project will be taken into consideration and addressed prior to the release of the final EIS.

Thank You

Don Vetter  
9105 Spanish Trail  
Sparks, Nevada 89436  
775-425-9271

## Responses

39-3

Comment noted. Refer to response 10-1.

## Comments

## Responses

**Letter 40** Bureau of Land Management, Field Office.  
5665 Morgan Mill Rd.  
Carson City, NV 89701  
Attn: Terri Kuntson

2003 DEC 10 AM 11:59

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

Re: Tracy to Sliver Lake Power Line

Dear Terri,

We are writing to express our opinion regarding the proposed overhead electric transmission line that will go east to west through B.L.M. land and the Spanish Springs Valley.

While we understand that increased electrical capacity is necessary for a growing area, we do not believe that overhead power lines are the best answer. We have many concerns regarding this method of delivery of power. It is our understanding that overhead power lines pose the risk of starting fires from downed lines. In addition, these lines also pose an electrocution threat, both to animals, such as the eagles living in the valley, and to humans if the lines are downed.

**40-1**

**40-2**

**40-3** We are also concerned regarding the possible health risks. To date there are numerous research studies indicating the negative effects of living near or under high-voltage transmission lines. Granted, research is continuing, but until it is clear that these lines pose absolutely no risk, we are not willing to subject ourselves and more importantly, our children to the potential risk.

**40-4** Finally, we are concerned with the loss of esthetics that this project would bring to this beautiful valley. There is simply no way to hide the ugliness of the power poles and lines. We would suffer a very large loss of natural beauty in this area, beauty that is quickly disappearing from cities and towns across this country.

**40-5** There is a solution to this problem; use the available method of underground transmission lines. Certainly, we are using this technology in all new subdivisions. Utilizing underground lines will eliminate most of the previously mentioned hazards with minimal disruption to the landscape. Obviously, this method has a higher installation cost. However, it would seem that the maintenance cost of an underground power line is far less than an over-head line, thus eventually equaling out the cost. In addition, it would give the opportunity to properly size the lines the first time, instead of making multiple requests to upgrade and existing line.

**40-6** A second option is to use insitu power generation, by requiring new subdivisions to have photovoltaic, passive solar thermal, and wind generation capabilities.

In conclusion, please understand that this is not a, "not in my back yard," issue. We understand the necessity of the line, we simply believe that excluding the use of renewable energy options, an underground line would be far superior to overhead transmission.

Thank-you for your time and consideration of my opinion.

Sincerely,

Dan and Capa Casale  
135 E. Sky ranch Blvd.  
Sparks, NV 89436

**40-1**  
Comment noted.

**40-2**  
Comment noted.

**40-3**  
Comment noted.

**40-4**  
Comment noted.

**40-5**  
Comment noted.

**40-6**  
Comment noted.



## Comments

Letter  
41

Bureau of Land Management, Field Office.  
5665 Morgan Mill Rd.  
Carson City NV 89701  
Attn: Terri Kuntson

Re: Tracy to Sliver Lake power line

Dear Terri,  
I would like to have my opinion known about the proposed overhead electric transmission line that will go east-west through B.L.M. land and Spanish Springs Valley.

41-1 I understand that we need electricity, but overhead power lines are not the best answer. Overhead power lines have caused many heartbreaks by starting fires from downed lines, electrocution hazard from downed lines. The power lines are also an electrocution hazard to the many eagles in are area. Power poles also present a climbing hazard to the many children in our area.

41-2 Then there is the lessor "but real" problem of esthetics. There is no way to dress up power poles and lines to make them look good. When a person looks out their window, they should see a beautiful landscape not a high-tension power line.

41-3 Last, there is the health issue to think about. Many articles have been written about the bad effects of living near or under high-voltage transmission lines. I believe this is a very real problem and sweeping the problem under the rug or hoping it will go away, will not help.

I believe that after may years of putting up poles and stringing wires we have found a better way...GO UNDERGROUND. All modern subdivisions are now constructed with underground power distribution grids. High-Voltage transmission lines should also be underground.

41-5 Going underground eliminates all of the hazards listed above and keeps our valley beautiful. I understand that this method has a higher installation cost. However, the maintenance cost of an underground power line is far less than an over-head line. Additionally the higher cost can be mitigated by properly sizing the lines the first time, instead of making multiple requests to upgrade and existing line.

In conclusion, if an alternate route for the power line cannot be found, then the only viable option is an underground power line.

Sincerely,

*Terri J. Casale*  
Terri J. CASALE  
2327 Cielo Vista Dr.  
SPARKS, NV 89436-9220  
1775 425 2233

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE  
2003 DEC - 9 AM 11:52

## Responses

41-1  
Comment noted.

41-2  
Comment noted.

41-3  
Comment noted.

41-4  
Comment noted.

41-5  
Comment noted. As stated in the beginning of Chapter 4, undergrounding is a mitigation measure identified to reduce impacts, and if applicable, will be identified as part of the final selected route.

## Comments

## Responses

Letter  
42

2003 OCT -8 AM 11:39

October 5, 2003

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

309 Shelby Drive  
Sparks, NV 89436

Ms. Terri Knutson  
EIS Project Manager  
Carson City Field Office  
5665 Morgan Mill Road  
Carson City, NV 89701

Reference: Draft Environmental Impact Statement  
Tracy to Silver Lake Transmission Line Project

Dear Ms. Knutson:

We live in Spanish Springs adjacent to the north south section of the Foothills Alternative west of Spanish Springs. We strongly oppose the Proposed Action and particularly the Foothills Alternative. We have reviewed the EIS and have the following comments:

- 42-1 | 1. It is imperative that public meetings be held for the EIS for a project with this magnitude of local impact.
- 42-2 | 2. It appears that only the Existing Corridor Alternative complies with the Regional Utility Corridor Report (RUCR). Priority should be given to "... using existing corridors over the establishment of new corridors..."
- 42-3 | 3. We strongly oppose the Foothills Alternative. Specifically it appears that two of the four principle guidelines of the RUCR will not be met. These are Avoidance of the view shed, the range west of Spanish Springs, and Separation from schools and residences. The view of the range west of Spanish Springs and north of Delores Drive is unobstructed. A transmission line would greatly impact the view shed. Table 4-5 indicates that the Foothills Alternative impacts the most qualifying structures of the alternatives.
- 42-4 | 4. We strongly oppose the alternatives, which cross the Pah Rah Range. These alternatives negatively impact the Spanish Springs Valley view shed. Additionally the EIS has given no consideration under Wildlife Resources to the large (as many as 100 animals at a time) antelope herd, which we have personally seen in the Pah Rah Range.

42-1  
Comment noted.

42-2  
Comment noted.

42-3  
Comment noted.

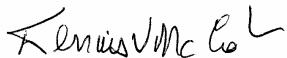
42-4  
Comment noted.

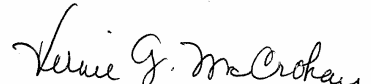
The hills immediately north of Reno and Sparks are now scarred with numerous transmission lines, utility corridors, and substations. There is no supportable justification for creating similar new corridors and facilities in the Spanish Springs view shed when existing corridors can be used. It is also likely that any alternative across Spanish Springs

## Comments

- 42-5 Valley will result in litigation delaying the project and increasing the cost of these alternatives. Regional Plans must be followed to avoid haphazard and unsightly growth. While there are some additional costs associated with the Existing Corridor Alternative, we favor this alternative if indeed a need is demonstrated.

Sincerely,

  
Dennis V. McCrohan

  
Vernie G. McCrohan

## Responses

- 42-5  
Comment noted.

## Comments

### LEAR FAMILY TRUST

P.O. BOX 680  
RENO, NV 89504  
775-786-1520

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE  
2003 NOV 13 A 11:32

Letter  
43

November 10, 2003

Ms. Shauna Adams  
Project Coordinator  
Sierra Pacific Power Company  
P. O. Box 10100  
Reno, NV 89520

Re: Proposed 120KV Transmission Line

Dear Ms. Adams:

Thank you for sending us a copy of Exhibit B for the Tracy-Silver Lake Line. We are concerned about the location of the line from Osage Road to the Silver Lake Substation designated AR 39A, AR 40, and AR 42. The map is quite small, so it's hard to tell exactly where the line is on or adjacent to our property.

43-1 We own the property from Lear Boulevard south along the west side of Moya Boulevard and the triangular shaped parcel east of Moya Boulevard where the line would run along the northern edge to the substation. We do not believe that Sierra has easements to accommodate a new line at this time. We think there may be a better location for the line to be explained later.

43-2 We have opened an escrow to sell the triangular property, approximately 45.72 acres, to Centex Homes for a 208 unit residential development. EMF's may not be a physical factor, but the public perception of having a line this close to homes would have a negative, and possibly costly, impact on this project. Therefore, we are opposed to this location of the project.

43-3 We believe a better route would be to extend the line due east along the Lear Boulevard to the railroad tracks. The exhibit indicates that there is already a distribution line and right-of-way along Lear. Then follow the railroad right-of-way to the substation. Looks to us like it might make construction easier also. We encourage you to consider that option.

Perhaps larger, more detailed maps would help us address the concerns. Please do not hesitate to contact us at 786-1520.

Very truly yours,

James L. Murphy  
Trustee  
(Lear/Sierra Pacific 11-03)

cc: BLM Carson City Field Office  
Attn: Terri Knutson, Planner

Michael Hughes  
Centex Homes

#### TRUSTEES

HAROLD P. DAYTON  
1442 COPPER COURT

JAMES L. MURPHY  
P.O. BOX 680  
RENO, NV 89504

RICHARD B. ROWLEY  
999 DARTMOUTH DR.  
RENO, NV 89509

## Responses

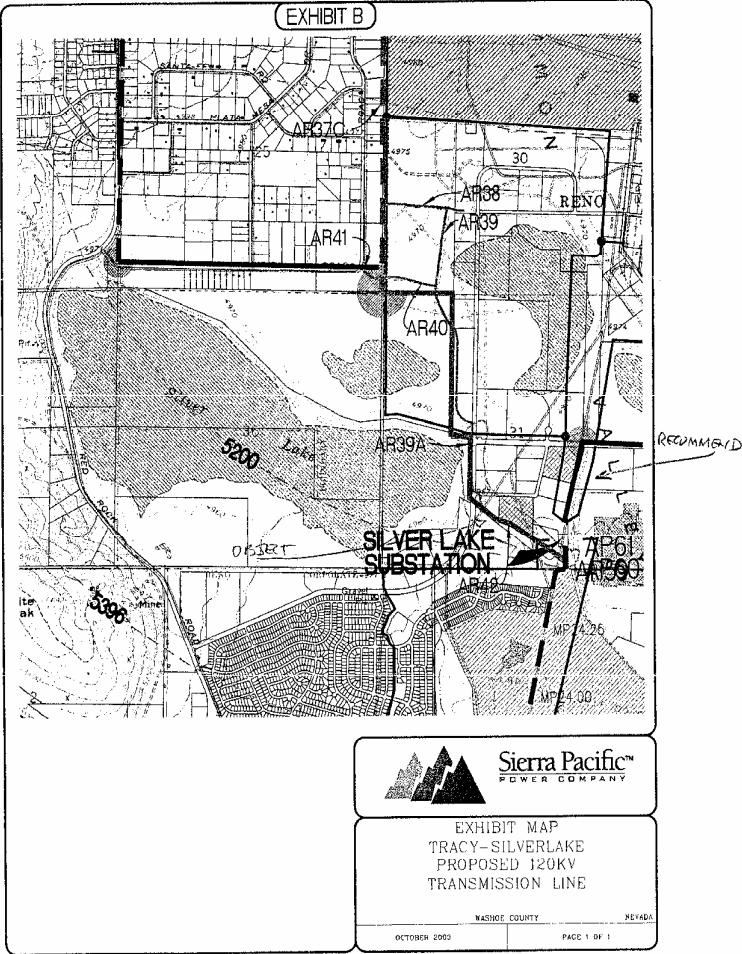
43-1  
Comment noted.

43-2  
Comment noted.

43-3  
Comment noted.

Comments

Responses



## Comments

## Responses

### Letter 44

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE  
2003 NOV 13 A 11:30

November 12, 2003

Ms. Terri Knutson  
EIS Project Manager  
Carson City Field Office  
5665 Morgan Mill Rd.  
Carson City, NV 89701

Dear Ms Knutson:

44-1

I do not want new high voltage, 120 KV power lines, in addition to the existing 25 KV lines on LA Posada Rd. in Spanish Springs, NV.

There are alternative routes that can be used rather than going through an established neighborhood.

If you value your job, I would suggest that an alternate route be made that does not disturb an existing neighborhood.

Sincerely,



James Short  
7788 Covered Wagon Ct.  
Spanish Springs, CA 93546

### Letter 45

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE  
2003 NOV 13 A 11:30

November 12, 2003

Ms. Terri Knutson  
EIS Project Manager  
Carson City Field Office  
5665 Morgan Mill Rd.  
Carson City, NV 89701

Dear Ms Knutson:

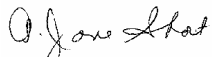
45-1

I do not want new high voltage, 120 KV power lines, in addition to the existing 25 KV lines on LA Posada Rd. in Spanish Springs, NV.

There are alternative routes that can be used rather than going through an established neighborhood.

If you value your job, I would suggest that an alternate route be made that does not disturb an existing neighborhood.

Sincerely,



Jane Short  
7788 Covered Wagon Ct.  
Spanish Springs, CA 93546

44-1

Comment noted.

45-1

Comment noted.

## Comments

## Responses

### Letter

46

Ms. Terri Knutson  
ELS Project Manager  
Carson City Field Office  
5665 Morgan Mill Road  
Carson City, NV 89701

2003 NOV -6 PM 12:03

Carson City, NV 89436-6248  
November 4, 2003

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

Dear Terri and Cooperating Agencies:

Please note Table S-1 showing qualifying structures within 150' of the transmission line. In the very near future, the La Posada route will be affecting many many people. Plans for the acreage that runs south on La Posada from the Cimarron development to Sky Ranch Park (toward Albertson's) will soon be developing 840 homes. The acreage north on La Posada, behind Cimarron, Our Barcelona subdivision, will undoubtedly be developed into even more homes. Our paved walking/biking trail along La Posada is directly under those lines now, and the additional lines will be 120 KV and even more powerful. This not only affects people living near those lines, but everyone that uses the walking/biking trails. (Please note that the Calle de la Plata Alternative only has two qualifying structures within 150').

46-1

As far as safety, we also have extremely high winds here, especially in the winter. It would be terrible if those lines were blown down in such a populated area. We realize that this can happen anywhere. In the Chester/Lake Almanor, Calif. area, we have seen lines blown down, lying dangerously on the ground like spaghetti, resulting from high wind storms. It took weeks to restore.

46-2

The visual effects will not be for a limited time. Those of us that live next to La Posada look out of our beautiful large windows and the poles and lines are in view all of the time. We paid alot of money for our homes and in developing our backyards, which we are still in the process of doing because of the expense. We should not have to see the poles, lines, guide wire eye sores, practically in our backyards. Although some of us are not exactly 150' from the centerline and are not included in the structure count listed, it affects alot more of us just as much and we feel that it decreases our property value. The future homes that will soon be built will have to face the same situations.

46-3

There have been various studies in which the electro-magnetic fields of powerlines have been suspect to causing a variety of health risks, including cancer. This has been debated for many years. The Health Department tells us that it is inconclusive, which means that they really don't know how much effect it has on people's health. If there is any health risk at all, we should not have this practically in our backyards, exposing children and adults twenty-four hours or directly over our walking/biking trails.

46-4

46-1

Comment noted.

46-2

Comment noted. The SPPCo engineers would design the 120 kV transmission line poles according to the Electric Safety Code "C2-2002" as approved by the American National Standards Institute.

46-3

Comment noted.

46-4

Comment noted.

continued on Page 2

## Comments

- 2 -

8061 Caceres Ct.  
Sparks, NV 89436-6248

46-5

In some studies, it has been suggested that magnetic fields may make other carcinogens more effective in causing cancer. These studies were called promotion assays. Depending on strength, electro-magnetic fields associated with powerlines, transformers and even electrical appliances can easily penetrate buildings or tissues and are difficult to shield. During our conversation with you, Terri, you advised that buried transmission lines could create as much or more than overhead lines. According to the Medical College of Wisconsin, in their powerline report, they state, "Burying transmission lines can substantially reduce their magnetic fields. The reduction in the magnetic field occurs because the underground lines use rubber, plastic or oil for insulation rather than air; this allows the conductors to be placed much closer together and allows greater phase cancellation. The reduction in magnetic fields for underground lines is not due to shielding." It goes on to say that if you are walking on top of the line or at the center of the transmission line corridor, the underground lines would have more magnetic field than overhead lines. However, at a little distance from the buried center of transmission line, the magnetic field is greatly reduced and is less than the overhead lines would be.

From a personal experience, my brother and his workers were installing barb wire fences near some transmission lines, and they were getting shocked before the electricity was ever turned on. Also, the electric company in Imperial County bought eight homes there so that they could run transmission lines near there.

The summary states "No prime or unique farmlands are within the project area." How about consideration for the people, in what will soon be a heavily populated area. Maybe they should have some Ordinances that would have the lines underground. If the proposed route along La Posada is the one that is eventually chosen, increase of population, property values and health concerns should at least warrant the lines being buried.

In closing, we know that no one wants to live close to these lines, however, we hope that all of the above will be taken into consideration, and we thank you and the Co-operating Agencies for that consideration.

Sincerely,

Josephine & Richard Magee (425-3298)

*Richard Magee*  
*Josephine Magee*

## Responses

46-5

Comment noted.



## Comments

## Responses

Letter  
47

**R.C. & PHYLLIS BARNES**  
**11000 OSAGE ROAD**  
**RENO, NEVADA 89506**

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE  
2003 OCT 29 A 11:55

[775] 677-4977

October 27, 2003

Ms. Terri Knutson, Project Manager  
U. S. Bureau of Land Management  
5665 Morgan Hill Road  
Carson City, NV 89701

Dear Ms. Knutson:

I am in receipt of your draft EIS for the Tracy-Silver Lake transmission line. I strongly protest the 20kv power line route currently being considered with above ground poles for the west border of the Reno-Stead Airport.

47-1 In the 'Proposed Action' route, the line would be situated only slightly more than 1,000 yards from the end of the 8-26 main runway, and this is the runway consistently used year around by student pilots training at Reno-Stead, often in significantly strong, gusty winds—a critical situation! One relatively small error and the margin of safety would be markedly reduced. Further, the flight pattern for the 8-26 runway brings these aircraft on the base leg south directly on top of or just west of the proposed route with the turn onto the final leg frequently right over the line.

As a former pilot, I am personally appalled that anyone is so insensitive to safety issues as to propose a dangerous overhead obstruction in this location . . . *when it is in no reasonable way necessary.*

47-2 I note someone has at least recognized these issues, for on page 4-58 a fifty-foot height is proposed, only 15 to 20 feet lower than the standard pole (Figure 2-3, p. 2-4). It is not enough!! If this is the route actually selected, I fervently urge that SPPCo be required to place the line underground along this western border. Company executives complain that placing the line underground costs "up to" (often in fine print) seven+ times that of overhead construction, a distorted figure considering it is based on an all-terrain average (Table 2-1, p. 2-5). The rock-free valley soils in this flat locale make this alternative much less expensive than the highly quoted 7x figure. In light of the very real safety concerns set out above, the modest added expense for burial along this three and one-half mile western boundary would seem to be more than justified.

Sincerely,



47-1

Refer to response 2-1.

47-2

Comment noted.

## Comments

## Responses

**Letter**  
**48** Pan Lambert  
760 Encanto Court  
Spanish Springs, NV 89436

December 12, 2003  
per : Tracy/Silverlake EIS

Here we go again! I am going to address only the Tracy/Sugarloaf section of the Draft EIS as that is where most of my knowledge lies.

In January 1998 when a special use permit was first requested by Sierra Pacific Power company for the Tracy/Sugarloaf portion of new transmission corridor, there was a statement by the affected parties on the proposed route that if the complete proposed transmission corridor was shown and if the corridor was undergrounded through residential areas, the parties on the Spanish Springs section would accept that section of it. We also requested that an EIS be performed on the whole route. When it became apparent that both the Planning Commission and the Washoe County Commissioners were going to agree include these restrictions in the Special Use permit SPPCO withdrew their request.

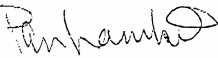
It is an improvement to have the EIS done and to see the complete proposed transmission corridor. However, the new proposed route of the Tracy to Silverlake Transmission corridor still retains qualities that caused the protest to the Special Use Permit for the original proposed corridor.

The new preferred route still is an above ground corridor through several residential areas with homes immediately adjacent to the proposed corridor. This is especially blatant in the proposed use of Rockwell to access Sugarloaf when the east side of Pyramid Highway with its commercial, proposed commercial and flood retention zones that reach from La Posada to Calle de la Plata is a very short block to the west.

Must we fight this issue again? Both the Planning Commission and the County Commissioners from 1998 to 2001 indicated that they would like undergrounding through residential areas. La Posada is scheduled to become a major arterial. Placing all of the utilities under ground will only enhance the reliability and safety of this route. Serious thought should be given to the visual and safety impact for this Proposed Corridor along Pyramid Highway which is also scheduled to become an important arterial. Rockwell should be removed from the route immediately as it is inappropriate being a small completely residential street except for the Albertson's corner.

SPPCO has itself stated that it had concerns about the vulnerability of its main corridor to disruption caused by vehicular accident. What are they thinking when they plan an above ground corridor along La Posada and Pyramid that is a flat narrow corridor scheduled to become a major artery in the next few years? The transmission corridor along North Mc Carren is at least protected by a substantial change of elevation.

Restrictions should be placed on the Proposed Corridor Route to limit it to 120kv.  
Thank you,



**48-1**  
Comment noted.

**48-2**  
Comment noted.

**48-3**  
Comment noted.

**48-4**  
Comment noted.

## Comments

## Responses

**Letter**  
**49** Terri Knutzen  
BLM  
5685 Morgan Mill Rd  
Carson City, NV

Dear Terri,

My name is Terrylyn Caulk, my family and I live at 420 Rockwell in Spanish Springs. (Our family consists of my husband and myself, our daughter and her two sons, ages 13 and 14, also 6 horses and two dogs) I am writing to you to let you know how we feel about the proposed power lines that SPPCO is requesting to build thru the Spanish Springs corridor.

**49-1**

Can you imagine looking out your windows and being in your backyard and seeing a 120kv transmission line running the length of the highway? Not only will it be **unsightly**, but what about **property values dropping, health hazards, noise levels from the lines, radio and television reception interference**, and who knows what else will come with these lines.

**49-1**

Comment noted.

**49-2**

We have invested into this property as our family home; please do not allow our area to become a power line wasteland. If the line has to go this route instead of over the mountains where there are no homes, please, please, **bury the lines**.

**49-2**

Comment noted.

Do we as homeowners have any recourse if the transmission lines go through?

I can be reached at home, 425-4514 in the evenings, at work 858-1611, or you can reach my husband Harry at 329-1131. Please let us know what we can do to stop the lines from coming into our neighborhood.

Sincerely,

Terrylyn Caulk

## Comments

## Responses

Letter  
50 VALLEA ROSE  
ROSIE RIGS MOBILE CAR WASH.

1401 Wagtail Court  
Spanish Springs, Nevada 89436

(775)742-9581 cell.  
(775)424-2026 fax  
rosierig@powernet.net

December 15, 2003

Dear BLM,  
Hi Terri,

I am a member of the Citizens Advisory Board in Spanish Springs as well as a member of the Community Management Plan, today I write this letter as a citizen for I do not speak for either boards as a whole.

50-1 My first concern is the fact that if a new transmission line is created from Tracy to Stead then that would be a new corridor so wouldn't this draft EIS actually need to be a corridor study in addition to a transmission line study?

50-2 In Spanish Springs Area Plan part of Washoe County Master Plan dated August 15, 2000 in Section SS.1.1.2 it states "encourage the underground placement of primary, distribution, secondary and service lines and other utilities for new development in the planning area." While the discussion is a transmission line maybe we could put the current lines underground and just have the new transmission line above ground like what has been discussed with the City of Sparks should the new line go down Sierra Pacifics choice of La Posada.

50-3 I would like to see the Spanish Springs substation line along I-80 used up before anything new gets created. Coming north on Pyramid Highway with the transmission line again burying the existing lines. This would be a clean look.

50-4 Since we all have to look at power poles lets make them pretty. Why couldn't we have contests of how the poles could be painted then the winner would win an art grant.....since this is becoming art town?

Everybody likes their heat in the winter and lights at night. While I understand the most cost effective line looks to be the most offensive to neighborhoods, I am hopeful that there will be evidence of flexibility with all parties involved to come to a fair resolution.

Thank you,  
Vallea Rose

50-1  
Refer to response 10-1.

50-2  
Comment noted.

50-3  
Comment noted.

50-4  
Comment noted.

## Comments

Dear Ms. Knutson:

**Letter 51** I am writing this letter in protest to the proposed power lines going down La Posada and up Rockwell to a substation in Boneyard Flats, or worse the alternate substation next to Albertsons.

My name is Marian Pava. My husband is Donald Pava. We moved into our home at 475 Rockwell Boulevard four and a half years ago. When we first moved out to Spanish Springs from our home in Sparks we were ecstatic over the beauty, the quietness, and the space that seemed to abound. The sunrises and the sunsets are exquisite, and we felt we were blessed that our view of the mountains was unrestricted.

**51-1** Having power poles run down La Posada and along Rockwell Boulevard and Pyramid Highway would ruin the natural beauty of Spanish Springs. We feel it will greatly devalue our property, especially if you choose to install the substation in the vacant lot next to Albertsons, which happens to be directly across the street from our home. The proposed power poles are incredibly ugly. They will destroy the esthetics of Spanish Springs.

**51-2** As homeowners and members of this community, we strongly urge the BLM to require the transmission lines to be put underground. We ask that no substation be put in the vacant lot near Albertsons. We ask that you consider the effect these transmission lines will have on individual property owners along the route and the many adverse effects this would have on property values, and quite possibly, the health of all who live along the route.

We appreciate the opportunity to be heard and we thank you for your time.

Marian Pava and Donald Pava

**Letter 52** SPPCO TRANSMISSION LINES Dec. 14, 2003  
To; Terri Knutson, BLM

**52-1** This is regarding the proposed 120kv transmission lines from Tracy power plant to the Stead Airport. I personally thought the people at the meetings regarding this situation were loud and clear. The only way to do this with out any problems is to go underground in any of the residential areas. I don't see that as a proposal yet. We live at 450 Rockwell – which I'm sure you know –would put the 70 foot power lines on our street behind Albertson's, one house from the lines going to Pyramid (and possible sub-station location), and then behind us on Pyramid.

**52-2** I have talked to realtors who state that these lines WILL bring down the value of the homes in the area of these power lines. You state that underground is to expensive, but homeowners losing money doesn't seem to bother you. How long would it take for a company like SPPCO to recoup any monies it would cost for the underground utilities. I realize that even though these lines are for another commercial area they have to get there somehow. But I also feel that the concerns of the existing residents should be considered. These homes were here first.

**52-3** As far as my wife and I are concerned, there are no options except underground or use existing lines (meaning 395). We just put a \$50,000.00 addition on our house and hate to lose that to depreciation due to power lines all around our house (and a possible sub station). We also have a problem with the possible health problems which have really not been addressed at this time. All people I have talked to in this area have similar problems with this proposal. Hopefully I have made it clear that this proposal is not acceptable.

Patricia and Thomas John  
450 Rockwell Blvd.  
Spanish Springs, Nv. 89436

## Responses

**51-1**  
Comment noted.

**51-2**  
Comment noted.

**52-1**  
Comment noted.

**52-2**  
Comment noted.

**52-3**  
Comment noted.

## Comments

## Responses

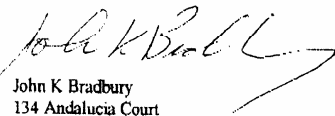
12-12-03

### Letter

53 Terri Knutson, Planner  
BLM Carson City Field Office  
5665 Morgan Mill Road  
Carson City, NV 89701

Ref: Tracy to Silver Lake Transmission Line Project

- 53-1 The best route to be used would be the existing corridor alternative Route from Tracy to Silver Lake. This has been used in the past and still be the main route for this new 120 kV Transmission line if needed.
- 53-2 The second best route would be the Northern Alternative as much of the area selected has lowest number of homes at this time and this would also be a loop for the northern area. This could service the proposed Sugarloaf substation easier and the proposed Stead Airport substation before reaching Silver Lake substation.
- 53-3 After reviewing the draft EIS for this transmission line by Sierra Pacific Power Company. If the proposed line from Tracy to Silver Lake be elected I believe the line along La Posada to Pyramid Hwy, up Pyramid Hwy to the Sugarloaf substation and along the Reno-Sparks Indian Colony should be underground.



John K. Bradbury  
134 Andalucia Court  
Sparks, NV 89436  
775-424-3511

53-1

Comment noted.

53-2

Comment noted.

53-3

Comment noted.

Comments

Responses

Letter  
54

2003 DEC -4 PM 12:24

12/03/03

RECEIVED  
BUREAU OF LAND MGMT  
HARRISON CITY  
FIELD OFFICE  
SUBJ: PROPOSED TRACY TO SILVER LAKE  
120 KV TRANSMISSION LINE

DEAR MS. KNUTSON

AS A HOMEOWNER IN THE BRIDAL  
PATH SUBDIVISION LIVING CLOSE TO THE  
PYRAMID HIGHWAY, I AM OPPOSED  
TO THE PROPOSED ROUTE FOR BOTH  
AESTHETIC AND ENVIRONMENTAL REASONS  
THE PUBLIC WOULD BE SERVED MUCH  
BETTER IF THE 120 KV TRANSMISSION LINE  
IS CONSTRUCTED ON THE NORTHERN ALTER-  
NATIVE ROUTE WHERE IT WOULD HAVE A  
NEGATIVE EFFECT ON A LOT FEWER  
PEOPLE AND BETTER SERVE FUTURE GROWTH  
TO THE NORTH.

VERY TRULY YOURS,



ROBERT MCKINNON  
25 HARRISON PLACE  
SPARKS, NV. 89436

54-1

Comment noted.

## Comments

## Responses

Letter 55 TO: BLM CARSON CITY FIELD OFFICE  
ATTN: TERRY KNUTSON, PLANNER  
5665 MORGAN MILL ROAD  
CARSON CITY, NV. 89701

2003 DEC -3 PM 12: 55

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

55-1 MY CONCERN RELATED TO THE 120K VOLT LINE FROM TRACY THROUGH SPANISH SPRINGS CAN BE REDUCED TO JUST A FEW REMARKS. WHERE THE 120 K VOLT LINE IMPOSES A NEW VISUAL IMPACT ON RESIDENTIAL NEIGHBORHOODS, IT SHOULD BE INSTALLED UNDERGROUND. IF THE POWER CO. CHOOSES THEIR PREPARED ROUTE ALONG LA POSADA, THEY HAVE STATED THAT THEY WOULD UNDERGROUND THE EXISTING DISTRIBUTION LINES AND PLACE THE 120 K VOLT LINES OVERHEAD. THIS MAKES NO SENSE. IF THEY DIG A TRENCH AND UNDERGROUND THE EXISING LINES, THEN THE 120 K VOLT SHOULD BE BURIED ALSO. IF THE POWER CO. OBJECTS, IT IS CLEAR TO ME THAT THEIR INTENTION IS TO ESTABLISH A NEW CORRIDOR FOR FUTURE EXPANSIONS.

55-1  
Comment noted.

55-2 IF THE POWER CO. INSISTS ON PUTTING THE 120 K VOLT LINE OVERHEAD THEN THEY SHOULD UTILIZE THE EXISTING ROUTE FROM TRACY TO THE SPANISH SPRINGS SUB STATION, THEN OUT STATE ROUTE 445 TO THE NEW SUBSTATION AT SUGAR LOAF. A POWER CO. REPESENTIVE STATED AT AN OPEN PUBLIC MEETING THAT THEY HAVE NO INTENTION OF INCREASING THE 120 K VOLT LINES ONCE THE NEW CORRIDOR IS ESTABLISHED. THAT BEING THE CASE, THE POWER CO. SHOULD BE REQUIRED, AS A CONDITION OF APPROVAL, TO SIGN AN AGREEMENT THAT BINDS THE POWER CO. AND ITS SUCCESSORS RESTRICTING THE CORRIDOR TO THE 120 K VOLT LINE. IF THE POWER CO. IS WILLING TO BURY THIS LINE, ANY ONE OF SEVERAL OPTIONS WOULD BE AGREEABLE. THE UNDERGROUNDING OF THE LINE IS THE KEY TO BEING ACCEPTED THROUGH THE AREA.

55-2  
Comment noted.

55-3

55-3  
Comment noted.

SIGN: *Will Brown* 12-1-03  
WILL BROWN  
2129 CIELO VISTA  
SPARKS, NV. 89436  
*Ph. 775-425-5588*



## Comments

## Responses

Letter  
56

William R. Jamieson  
3110 Grove Springs Drive  
Sparks, Nevada 89436

November 28, 2003

BLM Carson City Field Office  
Attn: Terri Knutsen, Planner  
5665 Morgan Mill Road  
Carson City, Nevada 89701

2003 DEC -1 PM 2:20  
RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

RE: Purposed Transmission Line in Spanish Springs

I am writing to share my concerns about the purposed transmission line by Sierra Pacific from the Tracy power plant through Spanish Springs to the Stead area.

While I understand that there is a need to keep up with not only current needs but to plan for the future, it is also important to consider the impact of those plans on not only the environment but the health and safety of the community.

Based on the article in the Reno Gazette on November 18, 2003, it appears that if Sierra Pacific had its way, none of the purposed transmission line would be underground. It is my understanding that there have been studies on a national basis showing that there are health issues associated with overhead transmission lines and whenever possible in residential areas, they should be underground.

56-1

56-1

Comment noted.

56-2

Another issue is the impact on our environment specifically- it would be an eyesore! I believe that there are opportunities to run this purposed transmission line utilizing both overhead and underground technology. It would appear to me that the line could be run overhead from the power plant to the east side of Spanish Springs where it could then be placed underground and run through all residential areas (current and future) located in the valley until it gets into the hills on the west side of the valley where it could then go back overhead. There might be more acceptance to something like this rather than Sierra Pacific stating "its premature to discuss the underground issue until the route is decided" which is clearly an unacceptable option by the community.

56-2

Comment noted.

Please place a requirement on Sierra Pacific to place any transmission line underground when going through Spanish Springs. Keep the overhead lines in the hills where they can't be seen!!

Thank you,



William R. Jamieson

## Comments

## Responses

Letter  
57

Bureau of Land Management  
Carson City Field Office

2003 DEC 17 PM 12:16

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

Tracy to Silver Lake Transmission Line Draft EIS

### Comments(s)

Name: Tunel Bacigalupo Date: 12/14/03  
Organization or Affiliation, if applicable: Red Rock Estates Property Owners Assoc.  
Mailing Address: 1105 Mineral Flat Road  
City/State/Zip:  Reno, NV 89506

Country living is chosen for its beauty and serenity. The rewards of hard work are the simplistic miracles of nature. The majestic mountains are painted orange and pink by the sunset, the stars illuminating the night sky unobstructed by city street lights, and the light of the full moon reflecting off fresh fallen snow, have all replaced television. The rooster call at sunrise, the cry of hawks as they soar overhead and the howl of coyotes is the music within the valley.

The land provides food and shelter for wildlife. To live in the country means working and living harmoniously with wildlife and nature, doing as much as possible to improve the environment without disturbing the precious balance already created by mother earth.

- 57-1 | The Sierra Pacific Power Company proposal for the Tracy-Silver Lake  
Transmission line project will not only affect the visual beauty of this precious land  
57-2 | but will also create a great disturbance in the balance of nature and the wildlife that

57-1  
Comment noted.

57-2  
Comment noted.

## Comments

## Responses

57-3 | depend on it, with land destruction from heavy machinery and EMF changes in the environment.

57-3  
Comment noted.

57-4 | SPPCo. Made empty promises that the North Valley expansions would be covered by the Alturus project. Five years later they are back with this proposal claiming a need for more power. SPPCo. Knows fully well that the North Valleys and their residents do not need or want business expansions and convenient stores. This is the excuse they use to move power lines closer to California for future energy sales. SPPCo. Can't seem to come up with any viable or logical reasons for not using their existing power line routes. SPPCo. Is only concerned about their own growth and expansion, producing unnecessary projects, paid for by their customers (Reno residents).

57-4  
Comment noted.

In a time of Black Outs and energy crisis, the opportunity for change is presenting itself. If there really is a need for more power for the growth and expansion of the community, then alternative power and working with the resources that are gifted to us through the sun and wind should be a priority.

57-5  
Comment noted.

The Mission Statement of The Bureau of Land Management is:

The Bureau of Land Management is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a manner to serve the needs of the American people for all times. Management is based upon the

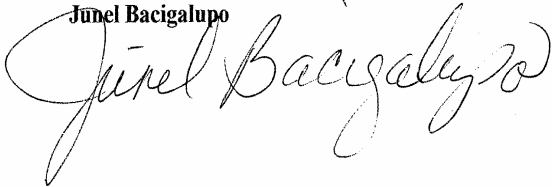
## Comments

principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation, rangelands, timber, minerals, watershed, fish and wildlife, wilderness, air and scenic, scientific and cultural values.

57-6 | I am asking you to stand behind that Mission Statement and deny SPPCo. The permits needed for their proposed project.

Please don't allow them to pave paradise and put up a parking lot.

Thank you for your serious consideration in this matter.

Junel Bacigalupo  


## Responses

57-6  
Comment noted.

## Comments

## Responses

**Letter 58**

To: BLM Carson City Field Office  
5665 Morgan Mill Road  
Carson City, NV 89701  
Attn: Terri Knutson

From: Ed and Charlene Murray  
1550 Destiny Ct.  
Reno, NV 89506

Re: Public Comments for the Tracy-Silver Lake Transmission Line Project

Dear Terri Knutson,

Please accept our comments relative to the project listed above. Previously our comments have been general and pertained to the entire project. These comments, however, are specifically directed at the personal impact these transmission lines would create. We want it documented that we are adamantly opposed to the Northern Route for the following reasons:

- 58-1 • Enormous visual impact. This route would place lines along the North and West borders of our property. The lines would come into Antelope Valley from Hungry Valley across the mountains to the East of our property. They would continue down our private road (Destiny Ct.) and then continue south along Antelope Valley Road. The transmission lines would be grossly visible from every point on our acreage and there would be NO spot where we would be free from that eyesore.
- 58-2 • Noise and visual impact with disruption of normal daily life. It is indicated on the Northern Route map that a staging area of approximate 20-30 acres would be located on the vacant properties to the North and East of our property. The EIS states that the staging areas are to be used for storage and supplies, and repair of equipment. There would also be an office set up during the construction time. This would certainly create a constant state of disruption for possibly years.
- 58-3 • Environment impact to the existing vacant land. With no houses built, as yet, on those properties designated for the staging area it would create total destruction of the natural environmental growth. When large parcels of ground are cleared it creates massive sand storms to the surrounding properties. Once that property is cleared there is no way to put it back the way it was. It will develop cheat grass and tumbleweeds for many years before returning to its natural state, if ever. You can check out the areas of previous fires in the valley to see the devastation. The CC and R's in Antelope Valley do not allow for properties to be completely cleared without permission from RREPOA.

**58-1**  
Comment noted.

**58-2**  
Comment noted.

**58-3**  
Comment noted.

## Comments

## Responses

58-4

- Conflict of interest with our Cooperating Agency. A portion of the Northern Route would run along Antelope Valley Road where the road has just been paved. Many homeowners along that route have just paid a \$6000.00 Special Assessment Fee for that road. Soon after the road was put in, Washoe County sent out new parcel maps to the property owners decreasing the frontage of their properties by 50 feet. There was no compensation for this land, but our parcel was changed from 10 to 9.3 acres. Since having less than 10 acres conflicts with the CC and R's for RREPOA, Washoe County simply said that we would be "grand fathered" in. No one has figured out what that means or how that will affect us later on. Our objection is that if the county votes to approve this route, they would receive the monetary compensation from the lines rather than the property owner because that land now belongs to them.

58-4

Comment noted.

58-5

- Usage of a transmission line maintenance road by 4WD vehicles. An easement road would be necessary to maintain the transmission lines and it would go by our home on Antelope Valley Road, run up Destiny Ct. and over Hungry Mountain. This would be an open invitation to any 4WD traffic to easily get from Antelope Valley to Hungry Valley and over to Spanish Springs. I couldn't even imagine all of the impacts from that situation.

58-5

An impact analysis of OHV use on maintenance roads is provided in chapter 4 under the "Recreation and Areas of Critical Environmental Concern" section. The final selected route will take into account the varying degrees of impacts to all resources, including OHV use.

We hope that whoever is looking at these public comments will take into consideration that people such as ourselves, after having lived in Nevada since 1964, have made the choice to spend their savings and build a quite place to retire. These transmission lines are of no benefit to Antelope Valley but just a way to get from one point to another. In doing so, however, they destroy the quality of some lives along the way.

# Comments

# Responses

Letter  
59

Bureau of Land Management  
Carson City Field Office

Tracy to Silver Lake Transmission Line Draft EIS

Comment(s)

Name: Will PETERSON Date: 12-09-03

Organization or Affiliation, if applicable: Pilot

Mailing Address: Bx 2655

City/State/Zip: SPARKS NV 89432

59-1

NEED YOU TO CONSIDER GREEN ROUTE OVER  
ALL OTHERS DUE TO LESS COST, LESS  
DISRUPTION OF COMMUNITY & DEGRADATION  
OF A SMALL AIRPORT

59-1

Comment noted.

(Please use additional sheets, if necessary)

This form should be sent to the Bureau of Land Management, Carson City Field Office,  
postmarked by **December 15, 2003**.

Bureau of Land Management  
Carson City Field office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
Fax: (775) 885-6147  
E-mail [tracysilverlake\\_eis@blm.gov](mailto:tracysilverlake_eis@blm.gov)

## Comments

## Responses

Letter  
60

Bureau of Land Management  
Carson City Field Office

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

Tracy to Silver Lake Transmission Line Draft 2003 DEC 16 AM: 07

Comment(s)

Name: J.M. BARMESS, MANAGER Date: 12/10/03

Organization or Affiliation, if applicable: SPANISH SPRINGS AIRPORT

Mailing Address: 1285 BARISL Bld #304

City/State/Zip: SPARKS NV. 89434

60-1

THIS IS A VERY BAD IDEA  
THE IDEA OF PLACING VERY HIGH POLES AND  
VERY HIGH VOLTAGE (60 feet 120KVA) WITHIN CLOSE  
PROXIMITY TO THE APPROXIMATE END OF AN ACTIVE  
RUNWAY IS NOT THE WAY TO LOOK AFTER  
THE FLYING PUBLICS WELFARE

(Please use additional sheets, if necessary)

This form should be sent to the Bureau of Land Management, Carson City Field Office,  
postmarked by December 15, 2003.

Bureau of Land Management  
Carson City Field office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
Fax: (775) 885-6147  
E-mail [tracysilverlake\\_eis@blm.gov](mailto:tracysilverlake_eis@blm.gov)

60-1

Refer to response 2-1.



## Comments

## Responses

Letter  
61

Bureau of Land Management  
Carson City Field Office

Tracy to Silver Lake Transmission Line Draft EIS

Comment(s)

Name: DIANNE BARNES Date: 12/10/03  
Organization or Affiliation, if applicable: Spanish Springs Airport  
Mailing Address: 1285 Barrow Blvd #304  
City/State/Zip: Sparks NV 89434

61-1

No ABOVE ground power line should be considered that would directly affect the safety of pilots landing or departing from the north end of the Spanish Springs Airport. Any & All power lines should be underground to eliminate any SAFETY HAZARD.

*Dianne Barnes*

(Please use additional sheets, if necessary)

This form should be sent to the Bureau of Land Management, Carson City Field Office, postmarked by December 15, 2003.

Bureau of Land Management  
Carson City Field office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
Fax: (775) 885-6147  
E-mail [tracysilverlake\\_eis@blm.gov](mailto:tracysilverlake_eis@blm.gov)

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE  
2003 DEC 16 A 11:07

61-1

Comment noted. Refer to Response 2-1. In addition, As stated in the beginning of Chapter 4, undergrounding is a mitigation measure intended to reduce impacts, and if applicable, will be identified in the Record of Decision.

## Comments

## Responses

Letter  
62

Bureau of Land Management  
Carson City Field Office

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE  
2003 DEC 16 AM 06

Tracy to Silver Lake Transmission Line Draft EIS

### Comment(s)

Name: Joseph DuRousseau Date: 12/08/03

Organization or Affiliation, if applicable: Spanish Springs Airport

Mailing Address: 95 E. Sky Ranch Blvd

City/State/Zip: Sparks NV. 89436

62-1 Any power line running close to an airport  
is a MAJOR SAFETY HAZARD and should NOT  
be allowed.

Of the alternatives available, the Southern Alt. is  
the best.

At NO TIME should lines be allowed in the  
approach/departure path of a runway

(Please use additional sheets, if necessary)

This form should be sent to the Bureau of Land Management, Carson City Field Office,  
postmarked by December 15, 2003.

Bureau of Land Management  
Carson City Field office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
Fax: (775) 885-6147  
E-mail [tracysilverlake\\_eis@blm.gov](mailto:tracysilverlake_eis@blm.gov)

62-1

Comment noted. Refer to Response 59-1.

## Comments

Bureau of Land Management  
Carson City Field Office

2003 NOV 17 PM 1:25

Letter

63

Tracy to Silver Lake Transmission Line Draft EIS RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

Comment(s)

Name: Crill Maples Date: 11/13/03

Organization or Affiliation, if applicable: \_\_\_\_\_

Mailing Address: 289 Omni Drive

City/State/Zip: Sparks, NV. 89436

63-1 I believe that if the existing  
Alternative Corridor (Yellow on Map) cannot  
be used that the Proposed Route (Blue)  
is the best solution. This is based on  
the least impact (Replacing poles on LaPosada)  
and the least over all impact on the  
varies Views around the valley's. Do not  
Put in either the Northern Alt. or the  
Calle de la Plata Alternative. Really wrecking  
Views. Thank you C. Maples

(Please use additional sheets, if necessary)

This form should be sent to the Bureau of Land Management, Carson City Field Office,  
postmarked by **December 15, 2003**.

Bureau of Land Management  
Carson City Field office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
Fax: (775) 885-6147  
E-mail [tracysilverlake\\_eis@blm.gov](mailto:tracysilverlake_eis@blm.gov)

## Responses

63-1

Comment noted.

## Comments

## Responses

Letter  
64

Bureau of Land Management  
Carson City Field Office 2003 DEC -1 PM 2:22

Tracy to Silver Lake Transmission Line Draft EIS RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

Comment(s)

Name: Howard Lambert Date: November 26, 2003

Organization or Affiliation, if applicable: \_\_\_\_\_

Mailing Address: 760 Encanto Ct.

City/State/Zip: Sparks, NV 89436

64-1

The currently proposed Tracy-Silver Lake 120kV transmission line would be a suitable route with the following qualification: If persons in residential areas that are directly impacted by the proposed line request that it be placed underground, then this condition should be included in the permitting process.

The many advantages of underground lines have been presented in "120kV Powerlines, A Vision of the Possibilities", presented by the Coalition for Community Friendly Power Facilities. (Request a copy from Howard Lambert, (775) 425-2284.) Japan and Europe routinely underground new 120kV lines and, in this country, 120kV lines are beginning to be placed underground in residential areas (see "SPR "Goes Underground" with New Projects in North & South" in Sierra Pacific and Nevada Power's October 20, 2003 issue of "Source".

(Please use additional sheets, if necessary)

This form should be sent to the Bureau of Land Management, Carson City Field Office, postmarked by **December 15, 2003**.

Bureau of Land Management  
Carson City Field office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
Fax: (775) 885-6147  
E-mail [tracysilverlake\\_eis@blm.gov](mailto:tracysilverlake_eis@blm.gov)

64-1

Comment noted.

## Comments

## Responses

Letter  
65

Bureau of Land Management  
Carson City Field Office

2003 DEC -3 PM 12:56

Tracy to Silver Lake Transmission Line Draft EIS

Comment(s)

Name: MARK + SUSAN BOYD

Date: 12-1-03

Organization or Affiliation, if applicable: \_\_\_\_\_

Mailing Address: 460 ROCKWELL BLVD

City/State/Zip: SPARKS NV 89436

OUR ONLY ARGUMENT WITH THE PROPOSED ROUTE  
IS THAT IT BREAKS AWAY FROM LA POSADA AND  
RUNS THROUGH A RESIDENTIAL AREA ALONG ROCKWELL  
BLVD, BEHIND ALBERTSONS. IF THE PROPOSED ROUTE  
WOULD CONTINUE ALONG LA POSADA CLEAR TO PYRAMID  
HWY. THEN TURN NORTH, OUR OPPOSITION TO THE  
ENTIRE PROJECT WOULD BE DROPPED.

THANKYOU FOR CONSIDERATION OF

OUR VIEWS.

Mark + Susan Boyd

(Please use additional sheets, if necessary)

This form should be sent to the Bureau of Land Management, Carson City Field Office,  
postmarked by December 15, 2003.

Bureau of Land Management  
Carson City Field office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
Fax: (775) 885-6147  
E-mail [tracysilverlake\\_eis@blm.gov](mailto:tracysilverlake_eis@blm.gov)

65-1

Comment noted.

## Comments

Bureau of Land Management  
Carson City Field Office

2003 DEC -4 PM 12: 21

Letter

66

Tracy to Silver Lake Transmission Line Draft EIS

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

Comment(s)

Name: Margaret Jackson Date: 12-02-03

Organization or Affiliation, if applicable: RS/C Cultural Committee

Mailing Address: 98 Colony Rd.

City/State/Zip: Paris, Nev. 89462

66-1

I attended the presentation @ Hungry Valley on Dec. 1-03, also the very first one last year or so. I was so disappointed to see the only changes made were so totally not in our favor. The proposed route still too near to our residences. And moving the sub-station to our area @ Hungry Valley. At the first meeting it was stated those down there a Pa Pa alla + north were very disturbed that their area was involved. What once their reasons, not good enough, that is where the growth really is. But is where the line should go. We in HV. (Please use additional sheets, if necessary) will not just sit still + allow it just because. We are people also + our concerns are just as valid.

This form should be sent to the Bureau of Land Management, Carson City Field Office, postmarked by December 15, 2003.

Bureau of Land Management  
Carson City Field office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
Fax: (775) 885-6147  
E-mail [tracysilverlake\\_eis@blm.gov](mailto:tracysilverlake_eis@blm.gov)

I also was certainly not impressed with the Power Co. rep - He was so totally insensitive + made no my question of our sacred site. He really needs some cultural sensitivity training. To help him in his arrogant manner.

## Responses

66-1

Comment noted.

## Comments

## Responses

Letter **I**  
67

Bureau of Land Management  
Carson City Field Office

2003 DEC -9 AM 11:40

Tracy to Silver Lake Transmission Line Draft EIS

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

Comment(s)

Name: JAMES G AND JEAN M. STEWART

Date: DECEMBER 7 - 2003

Organization or Affiliation, if applicable: RED ROCK ESTATES INC. (JAMES STEWART, PRESIDENT)

Mailing Address: 13915 RED ROCK RD

City/State/Zip: RENO NV 89506

IN RESPONSE TO THE ABOVE DRAFT EIS, AS A PROPERTY OWNER OF MULTIPLE PROPERTIES SEE EXHIBIT "A". I AM STRONGLY OPPOSED TO AN OVERHEAD 120KV LINE IN THAT AREA. I HAVE BEEN ACCUMULATING PROPERTY IN THIS AREA, PAYING TAXES AND PLANNING TO BUILD SEVERAL HIGHEND HOMES ON THIS PROPERTY FOR "MY RETIREMENT". I HAVE ENCLOSED TWO PICTURES TAKEN FROM MY PROPERTY, ONE OF WHICH HAS BEEN COMPUTER ENHANCED (BEFORE & AFTER)

AS YOU CAN SEE VALUES OF MY PROPERTY WILL DROP CONSIDERABLY

67-1 AND OVERHEAD LINES WILL ADVERSLY AFFECT MANY OTHER PARCELS WITH SIMILAR VIEWS SEE EXHIBIT "B", NOT TO METION THE AIR RACE COURSE

67-2 OF WHICH WE GIFTED 479 ACRES, IN 1984, TO SECURE THE NORTH PORTION (Please use additional sheets, if necessary) OF THE UNLIMITED RACE COURSE

This form should be sent to the Bureau of Land Management, Carson City Field Office, postmarked by December 15, 2003.

Bureau of Land Management  
Carson City Field office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
Fax: (775) 885-6147  
E-mail [tracysilverlake\\_eis@blm.gov](mailto:tracysilverlake_eis@blm.gov)

67-1  
Comment noted.

67-2  
Comment noted.

## Comments

Bureau of Land Management  
Carson City Field Office

### Tracy to Silver Lake Transmission Line Draft EIS

#### Comment(s)

Name: JAMES G AND JEAN M. STEWART Date: DECEMBER 7- 2003  
Organization or Affiliation, if applicable: RED ROCK ESTATES INC. (JAMES STEWART, PRESIDENT)  
Mailing Address: 13915 RED ROCK RD  
City/State/Zip: RENO NV 89506

67-3

I SUGGEST FOR THE RIGHT REASONS SIERRA PACIFIC POWER CO. PLACE  
2 OR 3 MILES OF THIS LINE UNDERGROUND SEE EXHIBIT "C". THIS UNDERGROUND  
MAILEAGE WILL BE SOMEWHAT SHORTER 30 TO 40% WHICH WILL HELP  
OFFSET COSTS. I LIVE AT 13915 RED ROCK RD AND KNOW ALMOST EVERY  
PROPERTY OWNER IN THIS AREA, THEY ARE MY NEIGHBORS FURTHERMORE  
I HAVE BEEN ASSOCIATED WITH THE SALES OF RED ROCK ESTATES  
FOR OVER 30 YEARS. THANK YOU FOR YOUR CONSIDERATION  
IN THIS MATTER. PLEASE CONTACT ME IF I CAN BE OF ANY  
ASSISTANCE RESPECTFULLY  
James Stewart  
(Please use additional sheets, if necessary)

This form should be sent to the Bureau of Land Management, Carson City Field Office,  
postmarked by December 15, 2003.

Bureau of Land Management  
Carson City Field office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
Fax: (775) 885-6147  
E-mail [tracysilverlake\\_eis@blm.gov](mailto:tracysilverlake_eis@blm.gov)

## Responses

67-3

Comment noted. As stated in the beginning of Chapter 4, undergrounding is a mitigation measure intended to reduce impacts, and if applicable, will be identified in the Record of Decision.



Responses

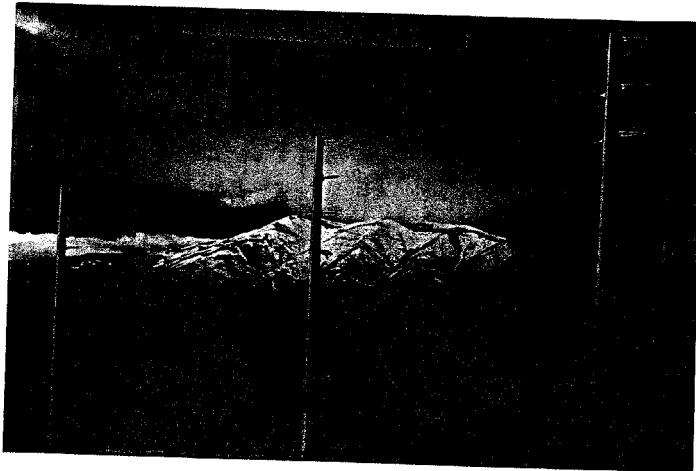
Comments

PICTURE PAGE

BEFORE



AFTER



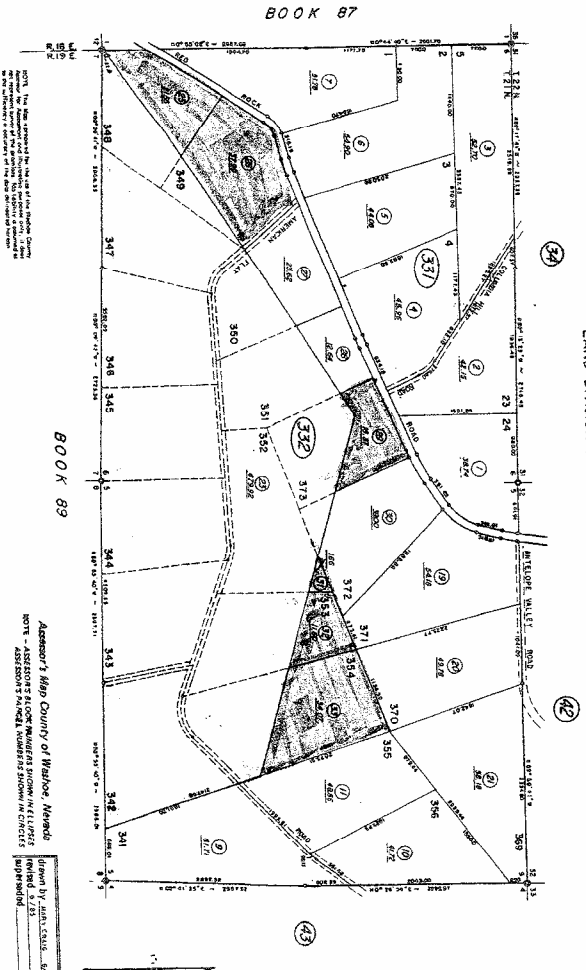
## Responses

PROPERTY OWNED BY MY FAMILY  
PROPERTY THAT RED ROCK ESTATES INC. DEEDED TO WASHOE COUNTY IN 1984 TO PRESERVE  
THE NORTHERN PORTION OF THE WILMUTED RACE COURSE

79-3.

EXHIBIT A

RED ROCK ESTATES  
LAND DIVISION MAP # 33



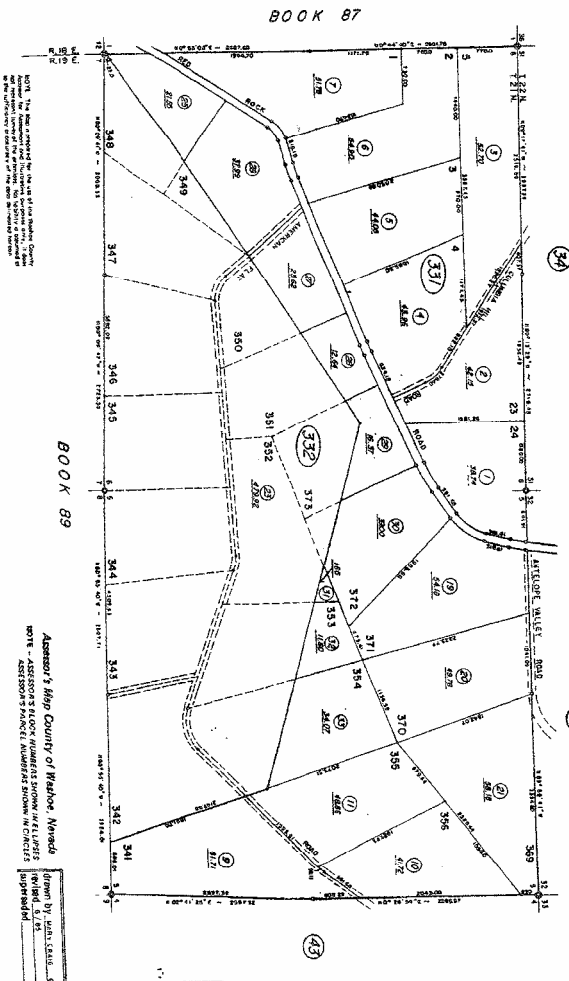
## Comments

Responses

PROPERTIES ADVERSELY AFFECTED BY SIERRA PACIFIC'S PROPOSED  
125 KV OVERHEAD TRANSMISSION LINE

79-3

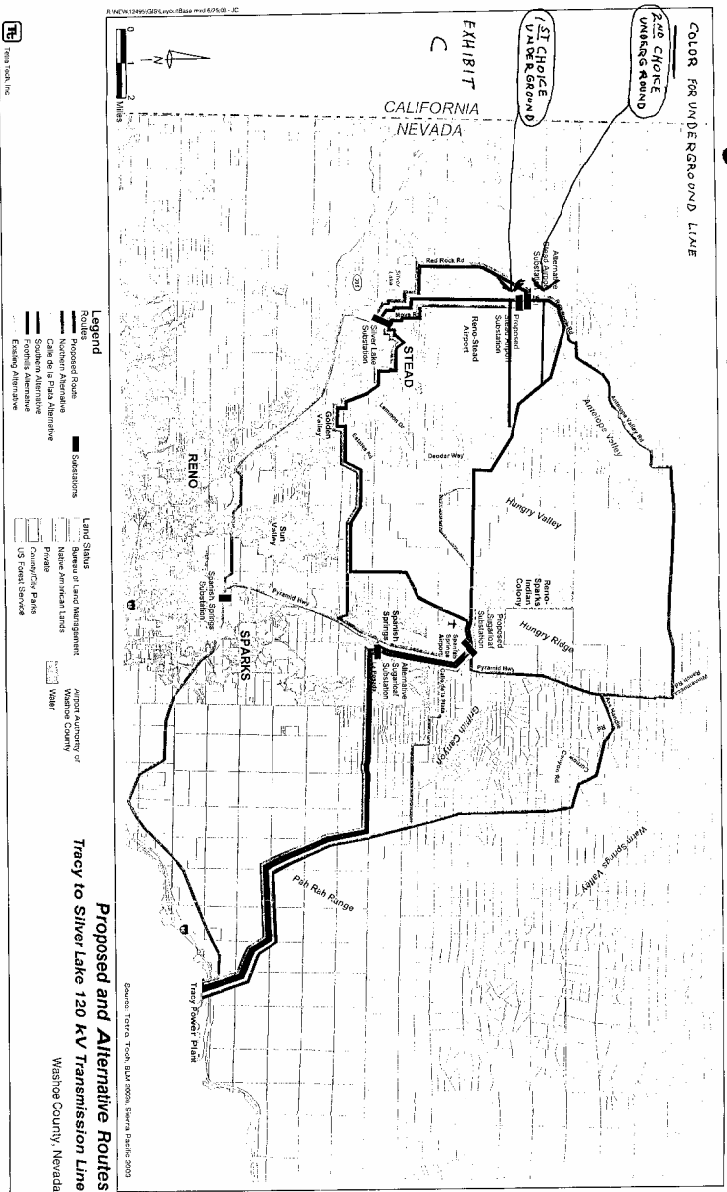
EXHIBIT B  
RED ROCK ESTATES  
LAND DIVISION MAP # 33



Comments

Responses

Comments



## Comments

Bureau of Land Management  
Carson City Field Office

2003 DEC 12 PM 12: 57

Letter  
68

Tracy to Silver Lake Transmission Line Draft EIS

Comment(s)

Name:

SUE BOYD

Date:

12.10.3

Organization or Affiliation, if applicable:

RRPOA

Mailing Address:

P.O. Box 40355

City/State/Zip:

Reno, NV 89504

I AM AT A LOSS for words to describe my feelings ABOUT A proposed ALTERNATE route for a power line. I purchased a 10 acre parcel in Antelope Valley in PG&E. I have been since looking forward to building & retiring there. This possible powerline down the center of the valley makes no sense to me. There are no wires that can portray the unnecessary impact on the property owners there. The power is not for our use or our need, now or forseen in the future. There is no need for an EIS. The impact is unmeasurable.

(Please use additional sheets, if necessary)

S. Boyd

This form should be sent to the Bureau of Land Management, Carson City Field Office, postmarked by December 15, 2003.

Bureau of Land Management  
Carson City Field office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
Fax: (775) 885-6147  
E-mail [tracysilverlake\\_eis@blm.gov](mailto:tracysilverlake_eis@blm.gov)

## Responses

68-1

Comment noted.

## Comments

Bureau of Land Management  
Carson City Field Office

Letter

69

Tracy to Silver Lake Transmission Line Draft EIS

Comment(s)

Name: DAVID CALL Date: 12-11-2003  
Organization or Affiliation, if applicable: SPANISH SPRINGTS PILOTS ASSN  
Mailing Address: 5875 LONG HORSE DR  
City/State/Zip: RENO NV 89502

69-1

I UNDERSTAND YOUR INTENTION TO INSTALL  
POWER LINES DOWN STORMY CANYON AND ACROSS  
THE APPROACH END OF RUNWAY 16. THAT  
WOULD BE OKAY IF IT IS LOW ENOUGH (UNDERGROUND?)  
NOT TO BE A HAZARD TO ARRIVING OR DEPART-  
ING AIRCRAFT. IF IT CAN'T BE BURIED IT  
SHOULD NOT BE IN THE VICINITY OF AN  
AIRPORT FOR REALLY OBVIOUS REASONS.

(Please use additional sheets, if necessary)

This form should be sent to the Bureau of Land Management, Carson City Field Office,  
postmarked by December 15, 2003.

Bureau of Land Management  
Carson City Field office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
Fax: (775) 885-6147  
E-mail [tracysilverlake\\_eis@blm.gov](mailto:tracysilverlake_eis@blm.gov)

## Responses

69-1

Comment noted.

## Comments

Bureau of Land Management  
Carson City Field Office

### Letter

70

Tracy to Silver Lake Transmission Line Draft EIS

#### Comment(s)

Name: Sandra & Ralph Theiss Date: Nov. 12, 2003

Organization or Affiliation, if applicable: \_\_\_\_\_

Mailing Address: 262 Echany Court

City/State/Zip: Sparks NV 89436

70-1

Our views are important to us. Please  
put these lines underground on La Posada.

70-2

The proposed Calb De La Plata is along a flood  
zone & would cause problems along the proposed  
alternative.

(Please use additional sheets, if necessary)

This form should be sent to the Bureau of Land Management, Carson City Field Office,  
postmarked by **December 15, 2003**.

Bureau of Land Management  
Carson City Field office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
Fax: (775) 885-6147  
E-mail [tracysilverlake\\_eis@blm.gov](mailto:tracysilverlake_eis@blm.gov)

## Responses

70-1

Comment noted.

70-2

Comment noted.

## Comments

Letter  
71



"gbarrere"  
<gbarrere@qmdnv.co  
m>

12/15/2003 07:14 AM

To: <tracysilverlake\_eis@blm.gov>  
cc:  
Subject: Draft EIS for the SPPCO Transmission Lines

Attn: Terri Knutson

I am writing regarding the draft EIS submitted to us for review. At this time I would like to state that the only way, I can support the proposed action (route) through the Spanish Springs Valley would be IF SPPCO were to place these transmission lines underground, especially in the Residential Areas (La Posada, Rockwell Blvd & Pyramid Highway), .

71-1

71-2

71-3

71-4

71-5

71-6

71-7

On page 2-6, referring to the proposed action it states: "A portion of the the alignment along La Posada would be within Sparks" meaning the City of Sparks. It is my understanding that the City of Sparks requires any new power lines to be placed underground. Thus, I think it only proper that the new line which "would continue north from La Posada ...along Rockwell Blvd, across a vacant lot near Virgil Drive (the alternative Sugarloaf Substation location) to Pyramid Highway" be required to be placed underground within that section of Washoe County. Having reviewed the costs of the project, stated in the EIS, it appears that the costs is an either or statement. Not all of the line would need to be placed underground i.e. all the way from Tracy to Stead. What is the cost for certain sections to be underground and the rest of the sections on poles?

I would, also, like to point out at this time that there is an error in the text during this section (page 2-6). The text actually reads "The line would continue north from LaPosada, **following an existing distribution line**, along Rockwell Blvd". The error is the bold marked section. There is no existing distribution line on Rockwell Blvd -- unless it is underground. If so, then yes, I am in favor of adding the new 120KV distribution line to the existing line.

Speaking of errors, I found several more. On page 2-18, second column, second paragraph the text reads: "The Southern Alternative would follow the same route as the Proposed Action form the Tracy Power Plant, along the Rocketdyne Line, La Posada, and **east** along Pyramid Highway". I think the text needs to read either along the east side or north along Pyramid Highway. On page 2-28, second column under the "Granite Pit Substation Location" heading the text reads: The transmission line would follow existing lines from Tracy to the Spanish Springs Substation, then follow the distribution line **north** along Pyramid Highway. The Granite Pit which is off Highland Ranch Road is south of the La Posada/Pyramid Highway intersection.

In conclusion, I feel the Northern Alternative is more viable, because the density of population impacted is less, than the proposed action.

Gloria Barrere  
415 Rockwell Blvd  
Spanish Springs  
Sparks, NV 89436  
(775) 425-2156

## Responses

71-1

Comment noted.

71-2

The City of Sparks Master plan encourages the undergrounding of transmission lines, it does not require it.

71-3

As discussed in Chapter 2 of the EIS, based upon the third party analysis of construction line costs, undergrounding would be approximately 1.69 million dollars per mile. It is impossible to determine what varying costs would be if a route was chosen with partial undergrounding and partial overhead transmission lines without knowing the final selected route. For this reason, Table 2-1 identifies a general comparative cost per mile for all possible alternatives.

71-4

Any reference to an existing distribution line along Rockwell Boulevard has been taken out of the text.

71-5

Text changed to read, "The Southern Alternative would follow the same route as the Proposed Action from the Tracy Power Plant, along the Rocketdyne line, La Posada, and **north along the east side of Pyramid Highway**, to the proposed Sugarloaf Substation."

71-6

The Granite Pit site is indeed south of the La Posada and Pyramid Highway intersection, however, it would be located north of the existing Spanish Springs Substation, and therefore the text reads correctly.

71-7

Comment noted.



## Comments

Letter  
72



Ohboykaboy@aol.com To: tracysilverlake\_eis@blm.gov  
12/14/2003 08:21 PM cc:  
Subject: power line in spanish springs

72-1

72-2

Terri, thank you for putting up with so much s--t with this line. As a real person, it must not be fun at your job with this kind project left on your lap. You should have recieved a phone message from myself with my vote.....I would like to see the "Calle de la Plata" route be put into action.....close in cost, less line along the hwy,and disturbance levels are about the same. Your attention is needed on page 2-6,(Description of the Proposed Action) first par.8th line....existing dist. line along Rockwell Blvd,.....there is not a line on Rockwell Blvd, there is a line on the hwy. If any Gov. or Company, was to do a report, all the facts should be addressed, seems that the biggest dislike is the Rockwell line and substation, if the facts are not true, its hard to believe this report. The fact of Rockwell Blvd. is not something one can over look, just drive down the street and look, at the fact that no line exist. I do not want a new transmission line built on Rockwell Blvd. ....ie; if there is not one there now, how is this worded "existing"

Mark Anders  
445 Rockwell Blvd.  
775 425 2668

Letter  
73



"D Bartmess"  
<bartmess@msn.com> To: <tracysilverlake\_eis@blm.gov>  
11/07/2003 10:16 AM cc:  
Subject:

Dear Terri Knutson,

I am the airport manager for the Spanish Springs Public Use Airport located just south of the Martin Marietta Gravel Pit in Spanish Springs Valley. I am writing to you regarding the proposed transmission line that will be adjacent to the Spanish Springs Airport. Our comments are as follows:

73-1

73-2

73-3

73-4

- 1) Information contained in the BLM draft for the Spanish Springs Airport is inaccurate. The runway length is 3540 feet not 3017 feet.
- 2) The Transmission line should be underground if it will in any way interfere or impact any pilot's ability to land or take off from the airport.
- 3) A FAA study should be done prior to any proposed construction to eliminate any hazards to the pilots. Please contact the local FAA inspector Dennis Taylor @ 775-888-7353 @ NDOT-Aviation Planning for more information on this study.
- 4) Please consider an alternative route to bypass the airport if this transmission line cannot be underground.

Thank you.  
Max Bartmess  
Airport Manager  
Spanish Springs Public Use Airport.  
775-425-4285 home  
775-772-8049 cell

## Responses

72-1

Comment noted.

72-2

Refer to response 71-4.

73-1

According to BLM files, the airport lease states that the length of the runway is 3017 feet.

73-2

Comment noted. Refer to response 2-1. In addition, As stated in the beginning of Chapter 4, undergrounding is a mitigation measure intended to reduce impacts, and if applicable, will be identified in the Record of Decision.

73-3

Comment noted. Refer to the response 2-1 and response 60-1.

73-4

Comment noted.

## Comments

Letter  
74



Herb Brady  
<brady501@charter.net>  
b

12/14/2003 10:04 AM

To: <tracysilverlake\_eis@blm.gov>  
cc: <mcarrigan@ci.sparks.nv.us>, <tarmstrong@ci.sparks.nv.us>, <art@ssvoia.com>  
Subject: Tracy to Silver Lake Transmission Project

Terri,

Our home is within the City of Sparks in the Cimmarron East Subdivision along La Posada.

While meeting the regional power needs is important, we feel strongly that a 120,000 - volt overhead transmission line should not be routed along La Posada Drive, in an area that is almost 100% residential.

74-1

It is not only a terrible blemish to a beautiful valley, but is a hazard to residents and to EMS, law enforcement, and Fire Fighting aviation. This area is served by both on a not so infrequent basis.

74-2

I am also curious why with a project that affects so many Sparks residents a presentation was not given to the Sparks Citizens Advisory Board. The transmission lines will actually be in the City of Sparks, not in the county.

SPPC should either incur the expense to bury these lines, or use another route that will not be such an issue with so many people.

Thank you,

Herb and Deborah Brady  
4232 Desperado Court  
Sparks, NV 89436

## Responses

74-1

Visual impacts are discussed in detail in Chapter 4 under the “Aesthetic Resources and Noise” section. Safety impacts are discussed in detail in Chapter 4 under the “Public Health and Safety” section. The final selected route will take into account the varying degrees of impacts to all resources, including visual and public health and safety.

74-2

The Draft EIS was presented to the Sparks Planning Commission on December 18, 2003 and to the Sparks City Council on January 12, 2004.

## Comments

Letter   
75

Terri Knutson  
12/16/2003 07:03 AM

To: David P. Parker/CCFO/NV/BLM/DOI@BLM  
cc:  
Subject: Public comment on Tracy to Silver Lake transmission line

----- Forwarded by Terri Knutson/CCFO/NV/BLM/DOI on 12/16/2003 07:04 AM -----



"Marilyn Brainard"  
<marilynangel@earthlink.net>

12/15/2003 04:51 PM  
Please respond to  
"Marilyn Brainard"

To: "Terri Knutson" <tknutson@nv.blm.gov>  
cc:  
Subject: Public comment on Tracy to Silver Lake transmission line

Ms. Knutson,

Please accept this public comment regarding the EIS for the Tracy to Silver Lake transmission line project:

**75-1** Nevada Power/Sierra Pacific Resources must consider the visual impact its project will have in the Spanish Spring Valley. We have a chance to choose the correct alternative, regardless of cost. The latter should not enter into the final option chosen.

Residents in the fast growing Spanish Springs area should not have to live with a corporate choice to save money for shareholders. If any one of the three alternatives proposed [through the northern portion of the SS area] is selected, then the only acceptable option is to bury those lines underground from the point where it crests the mountain ridge and heads west [La Posada or Calle de la Plata].

**75-2** The Northern Alternative [Axe Handle Rd.] is probably the best one to select. Here again, the lines must be below ground as they crest the mountain ridge and head north.

Thank you for your consideration, and I trust the BLM will make the correct decision for those of us living in the project environs!

Bill & Marilyn Brainard  
7326 La Costa St.  
Sparks, NV 89436

phone: 626-1775

## Responses

### 75-1

Comment noted. Visual impacts are discussed in detail in Chapter 4 under the "Aesthetic Resources and Noise" section. The final selected route will take into account the varying degrees of impacts to all resources, including aesthetic resources.

### 75-2

Comment noted.

## Comments

Letter  
76



"carolyn.brundtland@excite.com"

<carolyn.brundtland

10/10/2003 10:05 AM

Please respond to

carolyn.brundtland

To: tracysilverlake\_eis@blm.gov

cc:

Subject: Tracy-Silverlake Powerline

Attn: Terri Knutson, Planner

In regards to the proposed powler line that will link the Tracy Power Station with Silver Lake, I have concerns regarding Antelope Valley, as I own a parcel there.

This property was purchased because of it's beautiful views and restrictive rules for development. Now it seems, everyone is finding different uses that would criss-cross the valley at their convenience and for their profit!! I refer to the Hungry Valley cat litter mining project that is still 'on the table' and now these powerlines that would inter fer with the panoramic views that make our property so desirable.

**76-1** | Yes, the poles are ugly, and even though they are 120 kV now, after they are installed, the handwriting is on the wall--it would be so simple to convert them to high voltage and use 'existing lines". More and more, our homeowners dues are going to finance legal battles, to save our property values and quality of life.

I find that the enclol sed overview is not very specific. The map is fairly useless except for showing generalities. Therefore, the specific questions I have at this point are:

**76-2** | Exactly how Is my parcel at 8610 Matterhorn (#079-450-82) effected? How close would the lines come to this parcel? How will my views be effected?

**76-3** | Why can't these lines be put underground??

**76-4** | Is the power company willing to purchase the parcels most effected by this, whose land values would undoubtedly be negatively effected??

**76-5** | What kind of time line are we looking at? Months - years?

Thank you for your help.

Carolyn Brundtland  
530-272-0391

## Responses

**76-1**

Comment noted.

**76-2**

The only alternative that would come close to the property at 8610 Matterhorn Boulevard is the Northern Alternative. The line along the Northern Alternative route would be located a distance of approximately five 10-acre parcels from the property. Visual impacts are discussed in detail in Chapter 4 under the "Aesthetic Resources and Noise" section. The final selected route will take into account the varying degrees of impacts to all resources, including aesthetic resources.

**76-3**

As stated in the beginning of Chapter 4, undergrounding is a mitigation measure intended to reduce impacts, and if applicable, will be identified in the Record of Decision.

**76-4**

As discussed in Chapter 2, "SPPCo would provide financial compensation to private property owners when acquiring an easement, as determined by a qualified appraiser, by negotiation, or the courts. The appraisal process would include identifying the direct cost of purchasing an easement from a property owner and, where necessary, a calculation and compensation for consequential losses incurred on the remaining property as a result of power line construction".

**76-5**

See Chapter 2, under the Proposed Action section, 4<sup>th</sup> and 5<sup>th</sup> Paragraphs. The first phase is estimated to be completed in the year 2005 and the second phase is estimated to be started in the year 2009.

## Comments

## Responses

Letter  
77

Marie Capurro

RECEIVED  
BUREAU OF LAND MGMT  
CARSON CITY  
FIELD OFFICE

**From:** "Marie Capurro" <mcapurro23@charter.net>  
**To:** <tracysilverlake\_eis@blm.gov>; <wroullier@sppc.com>  
**Cc:** <mcapurro23@charter.net>  
**Sent:** Monday, December 08, 2003 9:25 PM  
**Subject:** Public Comment - Draft EIS for Tracy-Silver Lake Powerline

2003 DEC 11 P 12: 16

Dear Ms. Knutson,

I have carefully reviewed the draft environmental impact statement (d-eis) prepared by the Bureau of Land Management in relation to the Tracy to Silver Lake Transmission Project. I am a home owner in Spanish Springs and the proposed power line will be approximately 90 feet from my property line.

I have two specific issues that I would like to see addressed in the final environmental impact study.

77-1

First, I would like to see the d-eis adequately describe the full impact to the residents whose homes border La Posada. The picture in the d-eis does not demonstrate the full impact of a 120kV line to the residents of Cimarron, the Cimarron Highlands or the Sky Ranch subdivision. I have clipped the picture from the d-eis below and have included a handful of pictures that I took and modified to show the effect of the power line. I would like to see professional photographs taken from the corner of La Posada and Cordoba, facing east, La Posada and Eagles Nest, facing west and La Posada, at the entrance to the Cimarron Highlands, facing west with scaled graphic representations of the proposed power lines.

77-2

Second, I would like to see inclusion of specific information about the environmental impact if the lines were to be buried. This d-eis only describes the impact if the lines are run overhead.

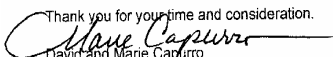
77-3

Homes in our neighborhood comparable to our residence are currently selling for \$450,000 - \$475,000. Is unlikely they will hold their value if this line is put in above ground. We encourage both the Bureau of Land Management, Sierra Pacific Power Company, the City of Sparks and Washoe County to either re-route the lines or bury them - surely the City of Sparks is not interested in driving out home owners, especially those who can afford to move elsewhere, but choose to live in Sparks?

La Posada is a residential street in a growing area. Is should not be allowed to become an above ground utility corridor.

Once the revised edition of the environmental impact study is available, I would appreciate having a copy provided to me.

Thank you for your time and consideration.

  
David and Marie Capurro  
8070 Tigre Court  
Sparks, NV 89436  
775-425-3016

mcapurro23@charter.net

Picture from Environment Impact Statement - Depicting impact to La Posada

12/8/2003

77-1

The BLM's Visual Resource Management (VRM) system was used to analyze potential visual impacts to BLM land from the proposed project. The VRM system for analyzing potential visual impacts is applicable to only BLM land. The impacts were analyzed from Key Observation Points and took into consideration the form, line, color, and texture of the land/water, vegetation, and structures. The impacts to non-BLM land were analyzed based on local area plans and their measures for protecting visual resources.

77-2

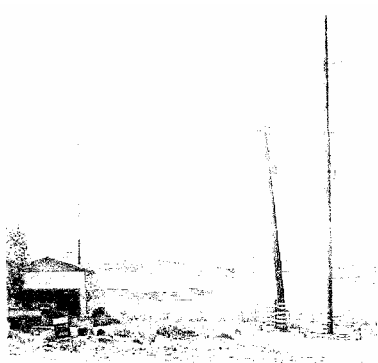
The overall inventory and analysis would be the same for both overhead and underground construction. Undergrounding has been identified as a mitigation measure.

77-3

Comment noted.

## Comments

## Responses



---  
Picture of La Posada facing west  
Taken at corner of Eagles Nest and La Posada.  
Shows custom homes, Cimarron and Sky Ranch Subdivisions (120kV power pole extensions added)



---  
Picture of La Posada facing east,  
Taken near entrance to Cimarron Subdivision at corner of Cordoba & La Posada (120kV power pole  
extensions added)

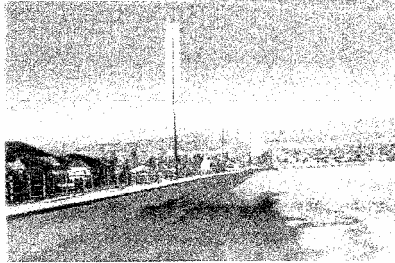
12/8/2003

## Responses

## Comments



Picture of La Posada at the new Cimarron Highlands Subdivision (120kV power pole extensions added)



Picture from patio of home on Tigre Court - Cimarron Subdivision (120kV power pole extensions added)



12/8/2003

## Comments

## Responses

### Letter

78



Steve Cavote  
<scavote@unr.edu>

10/08/2003 03:02 PM

To: tracysilverlake\_eis@blm.gov  
cc: scavote@unr.edu  
Subject: Aesthetic impact pg 49

Hello Terri,

Thank you for providing the T-S EIS and enclosed disc.

I haven't had much time to read it thoroughly, but did find one section disturbing. On page 49 of the Environmental Consequences, Chapter 4, the report refers to the minor impact along Curnow Canyon, because the rationale is that the area is sparsely settle. It seems that this misses the point entirely. A transmission line on the proposed Northern Alternative would have a **tremondously negative aesthetic affect** in sparsely settled areas, especially visual impact. One would tend not to be impacted by transmission line where there are a great many more people, homes, other human trappings because such things become part of the noise of civilization. While transmission lines in a sparsely settled area are, in fact, a large component of the surrounding environs, a greater portion of the panorama. Take a drive along the road between Wadsworth and Nixon. A few miles north of Wadsworth are 2 major transmission lines wandering east to west the occupy one visually for 5 or 10 minutes. That's impact!

I am of course biased because! I am building a home on APN: 076-180-16, recently purchased because of the view, that was designed specifically to take advantage of the the eastern view from my living room which was, is, and hopefully will continue to be devoid of obstructions such as transmission lines. The aesthetic impact of transmission lines traversing straight across this beautiful (I think the word is aesthetic) view will, I'm certain, be MAJOR.

Other than voicing my objections to the Northern Alternative, is there anything possible that I can do to prevent this from occurring?

Steve Cavote

--

Steven E. Cavote, PhD, [scavote@unr.edu](mailto:scavote@unr.edu)  
Associate Director  
Office of University Assessment  
University of Nevada, Reno  
775-784-4837

78-1

Comment noted.



## Comments

Letter  
79



Bev David  
<bevjdavid@yahoo.co  
m>

12/11/2003 12:26 PM

To: tracysilverlake\_eis@blm.gov  
cc: bevjdavid@yahoo.com  
Subject: Public Comment - Draft EIS for Tracy-Silver Lake Powerline

Dear Ms. Knutson,

After reviewing the draft environmental impact statement (d-eis) prepared by the Bureau of Land Management in relation to the Tracy to Silver Lake Transmission Project, We have some concerns. As home owners in Spanish Springs, the proposed power line will run approximately 110 feet from the corner of our property.

We would like to address two specific issues from the environmental impact study.

79-1

First, We would like to see information regarding having the lines buried versus arial. The d-eis only describes the impact if the lines are arial. My husband and I are both retired utility employees with over 58 years combined service. Working in the outside "plant" environment, we know the route of choice is buried cable whenever possible in order to secure the lines from environmental affects, damage and have a positive impact on the environment. We understand the cost is higher, however, we believe those incurring the need for the lines (developers and other communities) should carry some of this cost. La Posada is a residential street in a high growth area which should not become an above ground utility corridor. We would like to see specific information about the environmental impact with buried lines.

79-2

Second, We would like to have the d-eis sufficiently describe the full impact to the residents whose homes border La Posada. The photo in the d-eis does not reflect the full impact of the 120kV line to the residents of Cimarron, the Cimarron Highlands or the Sky Ranch subdivision. We believe renditions, including photographs, taken from various vantage points reflecting the route of the powerline are necessary for the homeowners affected by the line. Graphic representations of the proposed power lines with the impacted landscapes and homes is the only way we can assess the impact on our property.

Within our subdivision, homes sell for upwards of \$500,000. Certainly the value of these homes will be negatively impacted by these 120kV lines. We encourage the Bureau of Land Management, Sierra Pacific Power Company, the City of Sparks and Washoe County to either re-route the lines or bury them. We, and other homeowners who have purchased homes in this area, sought the rural environment which the City of Sparks prides itself in offering. Imposing these power lines may drive owners and buyers to other areas

## Responses

79-1

The cost comparison of underground versus overhead lines is located in Chapter 2 under the "Proposed Action" section and in table 2-1. A qualitative comparison of failures and incidents of underground versus overhead transmission lines is located in Appendix A and Table A-1.

79-2

The impact discussion of all resources includes impacts to the residents along La Posada. Refer to response 75-1.

## Comments

outside of Sparks.

We appreciate the opportunity to provide you with our comments and would like to request a copy of the revised edition of the environmental impact study. We appreciate your consideration relative to our comments.

Mike and Bev David  
8071 Tigre Court  
Sparks, Nevada 89436  
775-425-8071

bevjdavid@yahoo.com

## Responses

## Comments

Letter  
80



Douglas DeMers  
<douglas\_demers@po  
box.com>

12/15/2003 06:46 PM

To: tracysilverlake\_eis@blm.gov  
cc:

Subject: Comments on the Tracy-Silver Lake Draft EIS

Gentlemen-

Thank you for the opportunity to comment on the DEIS for the Tracy Silverlake project. As a landowner in Red Rock Estates, I am of course concerned about projects that may affect the aesthetics or value of my property.

80-1

The document seems well written and complete. As I am not a qualified engineer in this field, I cannot comment on the correctness of the environmental impacts identified in the report. However, I do have several comments regarding statements that seem contradictory.

I am particularly curious as to why the "Existing Corridor" route is not the proposed action. My reasoning is as follows:

According to the DEIS figure 2-11, the Existing Corridor Alternative would use about 35 miles of existing corridors. While slightly longer (approximately 38 miles rather than the 34 miles of the Proposed Action); approximately 92% of the route will utilize existing corridors.

80-2

Also in the DEIS, under the section entitled "Land Use" (Page S-2), "New overhead electrical transmission corridors and facilities (60 kV or larger) proposed on public lands would be discouraged in favor of using existing corridors [...]"

Yet the Proposed Action chooses a route other than the Existing Corridor.

Why?

80-3

I also find it very curious, under "Socioeconomics and Environmental Justice" (S-16) that 152 acres (and 110 parcels) would require easements for the Existing Corridor Alternative, whereas the Proposed Action would require 83 acres of easement land from 130 parcels. I admit I do not fully understand how easements work, but the Existing Corridor Alternative already has existing easements for 92% of its route. Applying a crude heuristic of 8% of the stated figures, it would seem to me that only approximately 12 additional acres and possibly 9 additional parcels would be affected by the Existing Corridor Alternative. Perhaps the existing easements would need to be re-negotiated? Unless the data presented represents new acreage and new parcels.

An accounting of new versus existing acreage and parcels as well as an explanation regarding the use or negotiation of existing easements would clarify my confusion regarding the data presented in the DEIS.

80-4

There is also an aesthetic consideration to recommend the Existing Corridor Alternative. Although power line engineers may think them beautiful, frankly, I find power poles unsightly at best. I suspect that most of the public also holds that same opinion. There have also been numerous studies regarding adverse health aspects related to high voltage transmission lines. Utilizing the Existing Corridor Alternative would seem to me to reduce the "sight pollution" as well as "EMF

80-5

pollution" aspect of this project.

## Responses

80-1

Comment noted.

80-2

The Proposed Action was identified by Sierra Pacific Power Company in their Right-Of-Way application to the BLM. As such, the Proposed Action must be evaluated as submitted.

80-3

The Existing Corridor Alternative would require more acres of easements than the Proposed Action Alternative because where SPPCo would need to parallel existing lines; they would need to acquire additional easements.

80-4

Comment noted.

80-5

Comment noted.

## Comments

I do understand that there are financial (and possibly service) considerations in utilizing or possibly having to replace power poles along the Existing Corridor Alternative.

**80-6** | It seems to me that the Proposed Action may be an easier and cheaper solution for SPPCo, but is not in the best interests of the public.

Thank you for the opportunity to comment on this project.

Sincerely,  
Douglas DeMers

--  
douglas\_demers@pobox.com  
650.960.8264 (home)  
408.406.1663 (cell)

**Letter  
81**



Jim Dick  
<dickja576@yahoo.co  
m>

To: tracysilverlake\_eis@blm.gov  
cc:  
Subject: Power Line

11/18/2003 11:36 AM

**81-1**

This e-mail is to protest any power line above ground from going through any part of Spanish Springs and down La Posada. I live here and want to keep the neighborhood as nice as it is now. There is enough building going on to blight the area without having to put up with power lines swinging in the air. Thank You

J Dick 2585 Las Plumas Dr Sparks NV 89436

## Responses

**80-6**

Comment noted.

**81-1**

Comment noted.

## Comments

Letter  
82



Daddyator@aol.com  
11/21/2003 10:28 AM

To: tracysilverlake\_eis@blm.gov  
cc:  
Subject: Powerline in SpanishSprings

Dear Ms. Knutsen,

Concerning the proposed power line that is to run through the Spanish Springs area, I have two questions or issues. When Sierra Pacific Power (SPP) brings in this 120-kilovolt line into the area, as I see that they must do in order to meet power demands, the first issue is if it is above ground, how will it affect property values? Second is a safety issue. SPP states that the above or below ground issue should be resolved until after the route is established, and I would question that the route cannot be established until these issues are resolved. If it is underground, than it is less obtrusive, less evasive to the surrounding areas and quite likely more acceptable to the impacted residents.

SPP is concerned about costs, and property owners are concern about their home property value depreciating. If SPP can prove and promise that home values cannot and will not be negatively impacted by the close proximity of the above ground power line, than the question becomes a moot point.

When I mention safety, I not only mean from a large scale accident/event stand point, but from just stupid kids doing stupid things point of view. This huge power line running through/near a residential neighborhood is just asking to become a potential target to "dumb teenagers" or "kids." I not only mean serious types of activities, but minor ones such as graffiti. Nothing is more inviting to a bunch of kids than a huge pole or a fence surrounding something. Does SPP have valid statistics on their vandalisim/accident rates when this type of structure is in such close proximity to residential neighborhoods?

I appreciate your time and attention in this matter. If you have any questions, please feel free to contact me.

Thank you,  
Joe DiPrinzio  
1224 Pullman Drive  
Sparks, Nevada 89434  
(775) 356-6459

PS- I currently live in Sparks, but have purchased property out in the Spanish Springs area. Again, thank you for your time.

## Responses

82-1

Impacts to property values from the proposed project are discussed in chapter 4 under the "Socioeconomics and Environmental Justice" section. Safety impacts are discussed in detail in Chapter 4 under the "Public Health and Safety" section. The final selected route will take into account the varying degrees of impacts to all resources, including property values and safety.

82-2

Comment noted.

82-3

There are no known statistics on vandalism/accident rates for these type of structures in residential neighborhoods.

## Comments

## Responses

Letter  
83



"michael duc"  
<mduc2@charter.net>  
12/14/2003 05:25 PM

To: <tracysilverlake\_eis@blm.gov>  
cc: "michael duc" <mduc2@charter.net>  
Subject: Tracy Silverlake Power Line

Dear Terri Knutson,

December 14,2003

This is a follow up of our telephone conversation.

I would like to recall a number of points which we discussed so there may be some acknowledgement of futher problems that I was subjected to by Sierra Pacific.

Sierra Pacific Power misled me on a number of points concerning my property.

1st They sued me for access to the property which costs me 1000.00.

2nd They lied repeatably about a number of points.

A. They said the poles would be 50 feet tall. They would only carry one line of 120kilo volts.

B. The route could not be changed under any circumstances. They have sole authority over this project.

C. I could never have access to the engineers or engineer to get or give an explanation concerning the route through my property. I would never be allowed to talk to the woman who is the project manager for Sierra Pacific.

D. Sierra Pacific decides how much compensation I would receive for the right of way. I was told by the right of way agent that it is only pennys on the dollar worth. They do not consider the line in the air as part of the right of way. Only the land the poles are erected on.

E. They were not interested in any co-operation with me.

F. I went to Sierra Pacific office and was told that there was absolutely nothing I could do..they and they alone decide what, when, how, why.

G. I asked how about putting the cable underground. They said absolutely not.

H. I explained that doing a 90 degree turn in the middle of my property needed to be looked at again. They said no. They again said too bad and they felt for me but nothing could be done. They admitted they had already gone to my property months before and that the route would remain. Then out of the blue they said they might move the line to the south. But not the west...which made no logical sense.

If you look at a map of my land and the existing pole route, a perfectly good alternate could be done without going with their route, like following the property lines. They said no.

They said they had to follow exact prescribed plans that the BLM made and that the routes are what is left after the BLM requirements. They made the BLM out to be the bad guy.

I dont know why they couldnt bury it and put is along the property lines. They would rather ruin a number of people without any regard for anyone and their property so they could sell power to California by having a station a few miles from the border. Why cant they use existing routes?

I felt I had no option except to sell my land. I would rather keep it.

We have had it for over 25 years.

Sierra Pacific did not want to listen to anything I wanted to say or co-operate in any way. Here is anoth story of a little guy getting stomped on by a big corporation.

If I can add anything to help you in your decisions please let me know

because I am very willing to co-operate.

Thank you for your time.

Michael and Linda Duc


AP#076-380-02

83-1

83-1

Comment noted. The Existing Corridor Alternative is an existing route. In addition, wherever possible, the Proposed Action and Alternatives, utilized existing routes.

## Comments

Letter 84  malcolm b douglass  
<macdona@juno.com> To: tracysilverlake\_eis@blm.gov  
10/16/2003 12:46 PM cc:  
Subject: impact statement


Ms. Terri Knutson;

84-1 My name is Mac Douglass, and I am this years president of The Reno Radio Control Club. Our club has a flying site in Hungry Valley, located between the Indian colony and Lemmon Valley. In looking at the maps of the proposed lines, the only one I would be concerned with would be the one labeled Proposed Action line. If that line runs to the south of our field, then there is no concern, if it runs to the north, then there is cause for concern, as that is the area we use for over flights.

In looking at the maps enclosed, with out showing any of the trails or roads through the valley, it is hard to tell just where the line would be. Could we be enlightened? Thank you.

Mac Douglass  
1240-Manhattan St.  
Reno, NV. 89512

Ph. 322-7275

Letter 85  "TED EMEL"  
<TWEMEL@charter.net> To: <tracysilverlake\_eis@blm.gov>  
12/03/2003 07:16 PM cc: <tarmstrong@ci.sparks.nv.us>, <mcarrigan@ci.sparks.nv.us>  
Subject: Power Lines on La Posada

Dear Tracy:

My wife and I moved to Cimarron East from San Diego in March of this year. We spent an extra \$30,000 to get the lot we have because of the views. The rolling hills behind us, Mt. Rose, and the city lights of Reno made us decide on where we live.

85-1 We are totally against the construction of power lines/poles on La Posada and on the hills behind our house. We didn't pay the money to have ugly power lines behind us. Although never confirmed scientifically, the power lines may cause unhealthful conditions to all of the residents in our area. I would hate to hear about children who were born retarded because their parents lived next to these power lines.

85-3 In summary, please do not allow this construction to occur. There is no reason why the lines cannot be buried besides the fact that Sierra Power doesn't want to spend the money. Raise our electric bills, but don't spoil our view.

Sincerely,  
Ted Emel  
4181 Desert Fox Drive  
Sparks, NV 89436

## Responses

84-1

The Proposed Action and Alternatives (except for the northern alternative) are located south of your location.

85-1

Comment noted.

85-2

Comment noted.

85-3

Comment noted.

## Comments

Letter  
86



Stacie Easterwood  
<SEasterwood@gtiema  
il.com>

To: "tracysilverlake\_eis@blm.gov" <tracysilverlake\_eis@blm.gov>  
cc:  
Subject: transmission line project

10/20/2003 12:43 PM

86-1

I would prefer to see the Northern option as it appears to run in a less congested area of housing. naturally no one will want this line running next to their home. The route that provides the least impact to EXISTING homes would make the most sense for home-owners in this area.

Stacie Easterwood  
Warehouse Supervisor  
Game Tech International  
775-850-6057 775-850-6062 fax

Letter  
87



"SUZI EMEL"  
<SUZIEMEL@charter.n  
et>

To: <tracysilverlake\_eis@blm.gov>  
cc: <tarmstrong@ci.sparks.nv.us>  
Subject: FW: Power Lines on La Posada

12/15/2003 10:53 AM

To: Terri Knutsen,

87-1

I am writing to include my response to the proposed power lines through the Spanish Springs community. My understanding is that the same proposal was made some time back and was fought by the community. Why would you try again in a much more populated area where there are beautiful, new, expensive homes with gorgeous views of the Nevada landscape? (That is why we are here). If it were your property and home, you wouldn't want it either. So please, spend the money, bury the lines, get the power to the community, it is a win-win proposition. In addition, I feel that emails are a way to vent, however, one does not know if these are just deleted as a nuisance or really taken seriously. Is there a more formal, public forum in which to voice an opinion, even a vote? I fear we are going to be steam-rolled by another big company who only has one thing in mind, profit.

87-2

Suzanne S. Emel

4181 Desert Fox Drive

Sparks, NV 89436

## Responses

86-1

Comment noted.

87-1

Comment noted.

87-2

All emails and written correspondence are added to the Administrative Record of the project. There will be other opportunities for public input through the local agencies permitting processes for this project. Refer to Chapter 1 under the "Authorizing Actions" section.



## Comments

Letter  
88



Ewe2Dme@aol.com  
12/07/2003 04:22 PM

To: tracysilverlake\_eis@blm.gov  
cc:  
Subject: Attn: Terri Knutson, please

December 7, 2003

BLM Carson City Field Office  
Attn: Terri Knutson, Planner  
5665 Morgan Mill Road  
Carson City, Nevada 89701

Dear Terri Knutson:

For years we have absorbed continuing current information regarding the power, septic conversion, flood control and water supply situations in Spanish Springs. This educated opinion to add to your decision making process regarding the Spanish Springs proposed area power supply line changes follow.

We totally support the use of underground, however do understand the cost is exceptional. The only other reasonable placement is to use existing right-of-way corridors.

**88-1** | The many options in the detailed BLM report, Tracy-Silver Lake Transmission Line Project Environmental Impact Statement were studied at length, in detail. To utilize the existing corridors causes the least impact on flora, fauna, humans and area esthetic appeal. Even with possible additional perimeters/acreage needing procurement this seems the most sensible.

Thank you for such a comprehensive report, cost seemed no object, thus creating the possibility for thorough study of all options.

**88-2** | Hoping your recommendation will follow the existing corridors, under grounding what is necessary.

Very sincerely yours,  
Ed Endemano and  
Dee Endemano  
35 Martell Place  
Sparks (Spanish Springs), Nevada 89436-7505  
775/424-1700  
[ewe2dme@aol.com](mailto:ewe2dme@aol.com)

## Responses

**88-1**  
Comment noted.

**88-2**  
Comment noted.

## Comments

## Responses

### Letter

89



monte  
<monte@moondog.net>  
>

To: tracysilverlake\_eis@blm.gov

cc:

Subject: Tracy to Silver Lake Transmission Project

12/14/2003 08:59 PM

Please respond to  
monte

We want to start by saying, we realize that we need electricity, so we are not just naysayers. We wish Sierra Pacific would start looking at alternative power, for instance neighborhood fuel cells, solar power, or wind power. Which would eliminate the need for these obtrusive, dangerous, unhealthy, unsightly power lines we are talking about today. We live four doors away from La Posada, which is the proposed route. When we bought our property nine years ago in an already developed area, we accepted the existing power lines. A few years back those lines and poles got larger. We certainly do not want to see another increase! La Posada is a very congested area, run those new lines somewhere so the people moving in can see them and decide if they want to live by them. We do not want to live by them. If we must have the new lines, we vote

89-1

to run them down Calle de la Plata. But why must there be a jog to the South in Hungry Valley? The proposed route makes no such jog and we're sure that increases the price tag. The houses on Calle de la Plata are on large lots, and that area is not built out yet. There are only two houses within the 150', we don't think a 150' is far enough away. We wonder how many houses are within 500' on the proposed route versus Calle de la Plata?

89-2

Between the two routes, the proposed and Calle de la Plata. The system reliability is the same, the price is similar, the number of fault crossings is the same. The acres of erosion is less on Calle de la Plata, and people can decide for themselves if they want to live by those lines.

Monte Forbes  
Maralee Quanbeck  
8935 Spanish Trail Drive  
Sparks, NV 89436  
425-5125

89-1

The Calle de la Plata Alternative added the route dip in Hungry Valley to address any impacts that might affect the view shed from the RSIC.

89-2

The 150 foot separation distance was recommended and deemed suitable in the Regional Utility Corridor Report.

## Comments

Letter  
90



Nanetteraymond@aol.  
com

10/23/2003 07:09 PM

To: tracysilverlake\_eis@blm.gov

cc:

Subject: Sugarloaf powerlines

Ms. Knutson,

My Family lives in the Antelope Valley which is in the Northern alternative for this project. We received the EIS summary for the Sugarloaf powerlines and am worried that our area will be adversely affected by these awful looking powerlines. On page S-9 for the Northern alternative it states that there would be "no noticeable aesthetic changes to natural environment." We very much disagree with this statement. Everyone we have spoken with in my area agrees. The powerlines would look terrible from anywhere in Antelope Valley (especially in front of our home) and affect the future values of property here. The current poles are very small and insignificant visually. The proposed poles would visually cut through the valley and be a terrible eyesore forever.

90-1

Please change this Impact from "none" to the same as proposed route which is noticeable aesthetic changes to natural environment which would cause lowering of property values in this area.

This route would also require substantial blasting through rock going over the hill on Antelope Valley Road to the stead area. This is a residential area and we would think that the proposed route would be a lot better since there seems to be less residences. If you do decide on a different alternate route please use the existing poles along HWY 395 rather than creating another eyesore.

Please, please, please do not choose the Northern alternative.

Thank you for your consideration.

Mr. and Mrs. Clayton R. Girard  
1362 Antelope Valley Road

## Responses

90-1

The BLM's Visual Resource Management (VRM) system was used to analyze potential visual impacts to BLM land from the proposed project. The VRM system for analyzing potential visual impacts is applicable to only BLM land. The impacts were analyzed from Key Observation Points and took into consideration the form, line, color, and texture of the land/water, vegetation, and structures. The impacts to non-BLM land were analyzed based on local area plans and their measures for protecting visual resources.

## Comments

## Responses

Letter  
91



"Brian Goates"  
<Brian\_Goates@pasha  
net.com>

To: <tracysilverlake\_eis@blm.gov>  
cc:  
Subject: Transmission Line

11/19/2003 07:46 AM  
Please respond to "Brian  
Goates"

Ref- 11/18/03 Reno Gazette Article

I own a 40 acre parcel with a home on it on the border of Warm Springs and Spanish Springs Valley Ranches. We are not effected by the lines (in view anyway....that is I think).

I have lived here for 2 ½ years, having grown up in Southern California on the Palos Verdes Peninsula. I grew up there in the 70's when it was rural and before the homes became multi-million dollar properties. This area became popular due to its proximity to the airport and rural lifestyle. There are some similarities in So Calif. that I can relate to for the area I live in now that is being considered for the transmission lines.

In the early days in Palos Verdes, the power lines were above ground. Later they were put underground at great expense, due to lack of foresight. Fortunately they caught it early enough where it possible to carry out. There are many cities in that area that were less fortunate. The power companies kept adding on as growth demanded. Today, although these cities have become desirable to live in and the values have increased, they are blighted by an ugly maze of power poles....clearly a result of a lack of planning and foresight.

I see similarities out in the Spanish Springs area. Homes selling as quickly as they are built with buyers waiting in line. Over the next 20 years I see this area (10 plus acre properties) becoming one of a kind in terms of rural living and city access, similar to the desirability of the former Palos Verdes Peninsula. Has anyone observed the quality and sizes of homes being built on the larger parcels? There are some significant dollars being invested in some very substantial homes.

91-1

It would be a shame not to invest underground lines now, at least in those areas where there will be development and view by the public. The project needs a longer term view rather than simply addressing the budget and electricity load concerns of today. There are enough unsightly power lines in this state and while appreciating the necessity of power, consider the value of the land that will be ruined within close proximity of Reno. Blighting the land can ruin what could become a longer term unique community. Please consider this in your planning dollars and allocate the proper amount of dollars to minimize these unsightly power lines.

91-2

Sincerely,

Brian Goates


91-1

Comment noted.

91-2

Comment noted.


## Comments

**Letter 92**  **"Don V Gustavson"**  
<donvg@775.net>  
12/08/2003 03:15 PM  
To: <tracysilverlake\_eis@blm.gov>  
cc:  
Subject: Tracy to Silver Lake Transmission Project

Attn: Terri Knudson

**92-1** I strongly oppose the construction of overhead 120,000 volt electric lines planned along the area of La Posada Dr. in the Spanish Springs Area. I am a homeowner in the Cimarron Tract adjacent to the proposed construction. They should be rerouted or buried.

Sincerely,  
Don V. Gustavson  
3235 Zaragoza Dr.  
Sparks, NV 89436

**Letter 93**  **"Colleen Harsin"**  
<charsin@diid.org>  
12/15/2003 11:46 AM  
To: <tracysilverlake\_eis@blm.gov>  
cc:  
Subject: Tracy to Silver Lake Transmission Project - public comment

Dear Ms. Knudson,

We have carefully reviewed the draft environmental impact statement (d-eis) prepared by the Bureau of Land Management in relation to the Tracy to Silver Lake Transmission Project. We own a home in the Cimarron subdivision off La Posada.

Based on what we have learned about the proposed project, we have two specific issues that we would like to see addressed in the final environmental impact study.

**93-1** First, we would like to see the environmental impact statement to adequately describe the full impact to the residents whose homes border La Posada. The picture provided in the d-eis does not demonstrate the full impact of a 120kV line to the residents of Cimarron, the Cimarron Highlands or the Sky Ranch subdivision. The picture suggests that this is relatively unpopulated area that will not be marred and that very few homes in the area would be impacted by the placement of these high voltage lines. We would like to see more accurate representation of this area in photographs to be included in the environmental impact statement, as there are many homeowners in the area that stand to be negatively impacted by this project.

**93-2** Second, we would like to see inclusion of specific information about the environmental impact if the lines were to be buried. The draft of the environmental impact study presented only describes the impact if the lines are run overhead. In terms of the long-term development of this area, and the growth expected there, underground lines must be preferable on many counts.

**93-3** Homes in our neighborhood have appreciated significantly in value over the past year, and the area is continuing with positive growth. We are concerned about property values in this area, as well as the quality of life for residents here, if these lines are run above ground. Please, to all those involved with the environmental impact study on this project (Bureau of Land Management, Sierra Pacific Power Company, City of Sparks and Washoe County) consider re-routing the lines or burying them. We chose to live in Sparks, and will be very disappointed if a project such as this proceeds as it is currently planned.

Once the revised edition of the environmental impact study is available, I would appreciate learning how to obtain a copy.

Thank you for your time and consideration.

Marty and Colleen Harsin  
2955 Allariz Court  
Sparks, NV 89436  
775-425-3513

## Responses

**92-1**  
Comment noted.

**93-1**  
Refer to response 75-1.

**93-2**  
Refer to response 75-2.

**93-3**  
Refer to response 75-3.

## Comments

## Responses

Letter  
94



**DAN HERMAN**  
<karma777@earthlink.net>

12/13/2003 02:52 PM

To: tracysilverlake\_eis@blm.gov  
cc: Pan Lambert <panbert@att.net>  
Subject: Powerline input

December 12, 2003

BLM Carson City Field Office  
Attention: Terri Knutson, Planner  
5665 Morgan Mill Road  
Carson City, Nevada 89701

From: Dan Herman  
11275 Campo Rico Lane  
Sparks, Nevada 89436  
Home Phone 775-424-0822

Ref: Draft EIS Tracy-Silver Lake transmission line Sep 03  
Regional Utility Corridor Report August 12, 1999

Attached are a list of my issues and concerns regarding the proposed 120KV transmission line.

94-1

1. The major negative visual impacts of a above ground transmission line to the Spanish Springs are unacceptable. The proposed action transmission line would parallel 2.7 miles of Pyramid Highway. This routing would create a lasting negative impact to our community.

94-1

Comment noted.

94-2

2. My property is directly affected by the proposed route and three of the alternatives. All four of these routes would place the 120KV transmission line directly on my property. The view from the front of my house would be obstructed by significantly larger power poles and transmission lines.

94-2

Comment noted.

94-3

3. The 120KV transmission line will have a lasting negative effect on my property value. It appears the intent of SPPCo is to place the 120KV transmission line on an existing 10 foot easement that currently has a 25KV distribution line. This is totally

94-3

Comment noted.

## Comments

## Responses

unacceptable.

- 94-4 4. I fear that this EIS is being pushed through so SPPCo can avoid the Regional Utility corridor report recommendations. It is only a technicality that the RUCR has not been reviewed for conformance with the Truckee Meadows Regional Plan. SPPCo must comply with the spirit and intent of the RUCR, (ref. EIS page 4-3).

1 of 3

- 94-5 5. This transmission line will establish a new utility corridor. SPPCo states that it is their intent to use this as a 120KV above ground line, but the fact remains that future requests could result in a 345KV transmission line. I am deeply concerned that SPPCo is trying to establish a new utility corridor so they can upgrade it to 345KV transmission lines in the near future. The Wadsworth Power Generation plant has been approved but they do not have the 345KV transmission lines. I have been advised by a reliable source that they are planning on using SPPCo transmission lines to connect to the Tracy Plant but that there is not sufficient capacity to route this excess power to the Alturas 345KV line through Reno. Will SPPCo be back 5 years from now (or less) wanting to upgrade this proposed 120KV line to 345KV on this newly established utility corridor? I for one am very concerned.

- 94-6 6. Pyramid Highway will be expanded from two to four lanes directly in front of my property. I was informed by Nevada Department of Transportation that when this happens that the existing 25KV distribution power line creates a traffic safety hazard due to the close proximity of the power poles to the highway. The 120KV line will only exacerbate the problem.

- 94-7 7. The RUCR (Ref. EIS page 3-4) states that the location of new overhead utilities (60KV or greater) restricts occupied or inhabited structures from within 150 feet of the transmission center line. It appears that this could possibly restrict my ability to develop my property residentially and/or commercially.

- 94-8 8. The "load center" is much closer to the alternate substation in Spanish Springs. (ref. EIS page 1-4) My recommendation is that the transmission line be undergrounded from the East foothills down LaPosada to the alternate substation then undergrounded West along Eagle Canyon Drive to the Western foothills. This routing would also avoid the negative impacts to

94-4

The RUCR was adopted by the BLM in 2001 as a guideline, therefore the RUCR and recommendations have been fully considered in this document.

94-5

Comment noted.

94-6

Comment noted.

94-7

Comment noted.

94-8

Comment noted.

## Comments

the Reno/Sparks Indian colony.

94-9 9. I am concerned about the distribution powerlines from the proposed Sugarloaf substation and their affect upon the Spanish Springs airport. The EIS simply states that they are not considered in this document. How many distribution lines are projected for each substation? This is an unacceptable aviation safety risk that must be addressed.

94-10 10. The proposed natural rusting of the steel power poles is very unsightly. They should be painted a light tan or green color. (Ref. EIS page 2-6) I would point your attention to the Alturas poles on Highway 395 North of Reno.

2 of 3

11. In conclusion, undergrounding across the Spanish Springs Valley and Pyramid Highway would eliminate 95% of the opposition from the citizens of Spanish Springs. If the above ground line must come through Spanish Springs, SPPCo must comply with the RUCR quidelines. As an alternative the Northern alternative would have the least negative impacts to the Spanish Springs Valley community. This would also be good future planning to provide power to the North Valleys and would eliminate future transmission lines.

I am available at any time to meet with you to further discuss my concerns.

Very Truly yours,

Dan Herman

## Responses

94-9

Standard policy for SPPCo is to plan for two transformers per substation with four feeders per transformer. Ultimate build-out for Sugarloaf could be up to eight feeders over the next 20 to 30 years. The number of feeders actually constructed depends on the load growth .

Stead Airport is initially planned to have two feeders. The number of feeders ultimately constructed for this substation depends on load growth due to customer demand .

In addition, refer to response 2-1. The same mitigation and impacts would apply to both the Reno-Stead and Spanish Springs Airports.


94-10

Comment noted.



## Comments

## Responses

**Letter**  **JandEHowe@aol.com** To: tracysilverlake\_eis@blm.gov  
12/15/2003 09:53 PM cc:  
Subject: Letter on Tracy-Silver Lake Transmission Line

95

December 16, 2003

Terri Knutson, Project Manager  
U.S. Bureau of Land Management  
5665 Morgan Hill Road  
Carson City, NV 89701

We have lived in Silver Knolls for 28 years and are especially familiar with the needs and problems that have faced this community in the past, and will in the future.

We have studied the materials in the EIS summary for the proposed Tracy-Silver Lake Transmission Line Project. We conclude that a serious lack of professional planning, and a very incomplete viewing of the future of the Silver Knolls-Red Rock Estates-Antelope Valley area, exists in the summary.

This rural residential area has grown slowly in the thirty years since its original development. The residential lots vary from one acre+ to over forty acres. Future growth is expected to continue slowly because individual families must purchase land, and make original plans for the residential use of the property.

**95-1** The EIS shows no consideration of the potential growth in this area. No statistics are quoted to show any need for increased power delivery in the future. The development of commercially-zoned property on the Reno-Stead Airport also has been very slow, and is expected to continue only gradually.

**95-2** Sierra Pacific Power Company's reasons for a new substation to be called "Stead Airport Substation," are lacking in any logical support.

Even assuming commercial growth on the airport, no need is demonstrated for the Stead Airport Substation at the location indicated. The need on the airport could be handled from the existing Silver Lake Substation. It is just as close to the airport property as would be the Stead Airport Substation.

**95-3** The map shows that the Proposed Route, Northern Alternative, and the Calle de la Plata Alternative, all would traverse the established residential areas of Spanish Springs, the Reno-Sparks Indian Colony, Antelope Valley, Lemmon Valley and Silver Knolls. If it can be shown that any added power development is needed, the best-reasoned route is the Southern Alternative.

**95-4** With poles and lines up to fifty feet in height, hazards to aircraft using the 08 runway could be severe.

John and Elizabeth Howe  
11510 Osage Road  
Reno, NV, 89506

**95-1**

Refer to response 15-1.

**95-2**

Refer to response 15-1.

**95-3**


Comment noted.

**95-4**

Comment noted.

## Comments

## Responses


**Letter 96**  **"Vee Kelley"**  
<veek@mindspring.com>  
10/06/2003 12:12 PM  
To: <tracysilverlake\_eis@blm.gov>  
cc:  
Subject: Tracy-Silver Lake Transmission Line Project


Hello!

**96-1** I own property in the Spanish Springs area. It is a 10 acre parcel # Parcel 76-281-19. Do any of the projections affect my property directly?

Thanking you for your response.


Vee Kelley, Inc.  
ASI#240440  
Office: 770-594-8810  
Fax: 770-594-1987

**Letter 97**  **Terri Knutson**  
12/15/2003 07:13 AM  
To: David P. Parker/CCFO/NV/BLM/DOI@BLM  
cc:  
Subject: Poster  
----- Forwarded by Terri Knutson/CCFO/NV/BLM/DOI on 12/15/2003 07:13 AM -----

 **Panbert1@aol.com**  
12/12/2003 07:21 PM  
To: tknutson@nv.blm.gov  
cc:  
Subject: Poster

There is a poster/handout going out in Spanish Springs that looks like it is from me. It is not. There is much misinformation on it. I had only told the person putting it out that I would be available to answer questions about the project and to help affected people to organize in order to make their concerns known.

**97-1** I have no problem with the preferred route IF it is under ground along La Posada and moved to Pyramid Highway. Using Rockwell for a corridor is disgusting.  
Thanks, Pan

**Letter 98**  **"Christy Malone"**  
<cmalone@cabnr.unr.edu>  
12/15/2003 04:11 PM  
To: <tracysilverlake\_eis@blm.gov>  
cc:  
Subject: proposed power line

To: Terri Knutsen  
From: Christy Malone  
Re: Tracy/Silver Lake Transmission Line

**98-1** Please accept my apologies for the delay in responding, I loaned my Draft out to my other partners for review, and just got it back. The result of our review is that we are opposed to all extensions of the line north of Stead and Moya Rd. Zoning in the area the line extends north from there is large acreage, not urban development, and we see no reason to impact current residents, to line the pockets of a speculator on changing that zoning. IF there is no option to this proceeding despite our views(and many others) we favor the Southern Corridor OR Existing Corridor options, as they present the least blight on the landscape, and impact on homeowners. Thank you for the opportunity to comment.

Sincerely,  
Christy Malone  
11600 Osage Rd.  
Reno, NV 89506

**96-1**

The only alternative route that could affect Parcel # 76-281-19 would be the Northern Alternative. Under the Northern Alternative, the line would run a distance of approximately one 10-acre parcel away from the property.


**97-1**

Comment noted.

**98-1**

Comment noted.

## Comments

**Letter 99**  **"Ali McDowell"**  
 <alimcdowell@sbcglobe.net>  
 To: <Undisclosed-Recipient:>  
 cc:  
 Subject: Electric lines  
 12/03/2003 10:57 AM

Dear Tracy,

**99-1** My vote is against putting these lines over the beautiful hills behind me and down Las Posadas. They will devalue the properties in Cimarron east where I live and every

**99-2** development off of Las Posadas. They also present a possible health hazard. I know this has not been proven but it has not been disproven either thereby the possibility of a

**99-3** health hazard is great. These communities have many children who could be affected. No one ever bothered to tell us of this possibility before we built our home. Had we know this we would not have built here. Sparks needs to be proactive in keeping

**99-4** Sparks beautiful and these lines are an eyesore. If they must take that route then Sparks or the BLM must take the responsibility to have them buried underground. Please do not mar the beautiful view and give us a health hazard to live by. Our house is our greatest investment and that investment was made in Sparks as a growing beautiful area. Don't allow them to be put through our neighborhood and down Las Posadas.

I can also promise to vote against the mayor or any council member who votes for this plan. I will also work actively to let everyone know who voted for this if it goes through.

Thank you  
Sincerely

Ali McDowell  
4201 desert Fox Drive  
Sparks

**Letter 100**  **charles merkle**  
 <anob@yahoo.com>  
 To: tracysilverlake\_eis@blm.gov  
 cc:  
 Subject: Power Line  
 11/20/2003 06:51 PM

Dear Ms. Knutsen:

**100-4** I live in Spanish Springs and am concerned about the proposed above ground power line that Sierra Pacific plans to run through my area.

The map in the Reno Gazette-Journal of the various possible routes of the line was vague and showed no street names. Would you please send me a map that is clearer so that I can intelligently evaluate this situation and as importantly, see how close this line may be placed in reference to my house.

Marilyn Merkle  
1042 Sticklebract Dr.  
Sparks, NV 89436

## Responses

**99-1**  
Comment noted

**99-2**  
Comment noted.

**99-3**  
Comment noted.

**99-4**  
Comment noted

**100-1**  
Comment noted. Added to the mailing list to receive a full document.

## Comments

Letter  
101



"Penny A. Northrup"  
<pnorthru@washoehea  
lth.com>

To: <tracysilverlake\_eis@blm.gov>  
cc: <northrup1@aol.com>  
Subject: Sugarloaf powerline

10/16/2003 04:48 PM

Ms. Knutson,

I live in the Antelope valley which is in the Northern alternative for this project. I received the EIS summary for the sugarloaf powerlines and am worried that my area will be adversely affected by these awful looking powerlines. On page S-9 for the Northern alternative it states that there would be "no noticeable aesthetic changes to natural environment". I very much disagree with this statement. ( and everyone I have spoken with in my area agrees) The powerlines would look terrible from anywhere in Antelope Valley and affect the future values of property there. The current poles are very small and insignificant visually. the proposed poles would visually cut the valley and be a terrible eyesore forever.

101-1

Please change this Impact from "none" to the same as proposed route which is **"Noticeable aesthetic changes to natural environment which would cause lowering of property values in this area."**

101-2

This route would also require substantial blasting through rock going over the hill on Antelope Valley Road to the stead area. This is a residential area and I would think that the proposed route would be alot better since there seems to be less residences. If you do decide on a different alternate route please use the existing poles along hwy 395 rather than creating another eyesore.

Please, please, please do not choose the Northern alternative.

Thank you for your consideration.

Penny Northrup  
1395 Half Mine Road, Reno, NV 89506

and on behalf of:

Ray and Ronnie Girard (parents)

15400 Elkhorn Lane, Reno, NV 89506

## Responses

101-1

Comment noted

101-2

The BLM's Visual Resource Management (VRM) system was used to analyze potential visual impacts to BLM land from the proposed project. The VRM system for analyzing potential visual impacts is applicable to only BLM land. The impacts were analyzed from Key Observation Points and took into consideration the form, line, color, and texture of the land/water, vegetation, and structures. The impacts to non-BLM land were analyzed based on local area plans and their measures for protecting visual resources.

## Comments

## Responses

Letter  
102



"Jim Omori"  
<jromori@charter.net>  
12/15/2003 03:32 PM  
Please respond to  
jromori

To: <tracysilverlake\_eis@blm.gov>  
cc:  
Subject: SPPCO proposed transmission line in Spanish Springs

Terri Knutson  
Bureau of Land Management  
5665 Morgan Mill Road  
Carson City, NV 89701

Dear Terri:

I am writing this email in response to the proposed 120kV transmission line to be from the Tracy power station to Stead. I realized that the transmission line is necessary as an alternate loop for Sierra Pacific Power infrastructure; I do not care for the proposed route through La Posada, Rockwell Blvd then onto Pyramid Highway. This plan is flawed as it proposed to follow an existing distribution line, I surveyed the area and there is no existing line on Rockwell unless this line is constructed entirely underground.

102-1

102-2

My vote is for the **Calle de la Pata or Northern Alternative**, as this will have the least amount of visual impact.

Sincerely,

**James R. Omori**

James Omori  
445 Rockwell Blvd.  
Spanish Springs, NV 89436  
(775) 425-2668  
(775) 425-2669 Fax  
(775) 745-9295 Mobile  
[jromori@charter.net](mailto:jromori@charter.net)

**102-1**

Refer to response 69-4.

**102-2**

Comment noted.

Letter  
103



"Jeff Peters"  
<litejp@charter.net>  
10/30/2003 05:56 PM

To: <tracysilverlake\_eis@blm.gov>  
cc: "lynnette" <lynnette@charter.net>  
Subject: against route of transmission line down la posada

BLM,

103-1


We are against the transmission line down La Posada. We cannot understand how you can run it thru our neighborhood. We protested at earlier meetings and figured the government listened to us. I am very saddened by our government leaders to allow this.

Jeff and Lynnette Peters. 8695 Eagle Nest rd. Sparks, NV 89436


**103-1**

Comment noted.

## Comments


**Letter 104**  "lynnette"  
<litenet@charter.net>  
12/16/2003 03:25 PM To: <tracysilverlake\_eis@blm.gov>  
cc: <wroullier@sppc.com>  
Subject: silver lake transmission project

**104-1** I am concerned about the proposed Silver Lake Transmission Project planned for LaPosada in Spanish Springs. I live on Eagle Nest road -- near the proposed route. I like to walk, run and ride my bike on LaPosada. When I am near the substation east of Eagle Nest road I can see the heavy electrical wires moving and jumping with the current that is going through them. This energy seems like it would be a lot less harmful to people physically if the wires were buried. The poles and wires already ruin a very beautiful view. Having the heavier Silver Lake transmission lines and poles here would be even worse. Many of us built/bought homes out in Spanish Springs because of the view. I hope the transmission lines can be built where there are fewer residents. If it does have to come down LaPosada I hope it will be buried for aesthetic and health reasons. Thanks for working hard to make Spanish Springs a beautiful, healthy place to live. Lynnette Peters

**Letter 103**  Edgar.Pew@clorox.com  
m  
10/21/2003 04:42 PM To: tracysilverlake\_eis@blm.gov  
cc:  
Subject: Tracy-Silver Lake Transmission Line Project

**105-1** Hello. Our Reno HV Manufacturing facility recently received a copy of the Draft EIS for the above project. Our facility is located at 12150 Moya Blvd. Based on the maps in the EIS, it appears that the proposed route of the transmission line may be very close to our property, but we do not have enough detail to determine the exact street route in this area. Is there a way to obtain the exact path of the proposed line to better determine whether it would pass our facility and/or whether it is one of the several private properties for which a right-of-way would need to be sought for the line? Thank you for your assistance.

Edgar Pew  
Senior Counsel  
The Clorox Company  
Tel: (510) 271-4914  
Fax: (510) 271-1652  
Email: edgar.pew@clorox.com

**Letter 106**  "luverne@quik.com"  
<luverne  
11/24/2003 03:01 PM To: <tracysilverlake\_eis@blm.gov>  
cc:  
Subject: Pbulic Comment - Tracey Power Plant to Stead via Spanish Springs

In reference to the article in Sparks Today (Reno Gazette-Journal) dated November 18, 2003, we would like to state our comment.

Our choices on the proposed transmission line are as follows:  
1. Light blue (with some underground in heavier populated areas).  
2. Pink  
3. Blue (with underground on La Posada and Pyramid Highway)

**106-1** We live in the Cimarron Development and are aware of the increasing need for additional substations. However, we feel that the power line should be underground near developed housing areas. We purchased our home five years ago and we liked the looks of Cimarron & nearby Wingfield Springs because all utilities are underground.  
Joe & Luverne Lightfoot, 7851 Tormes Court, Sparks 89436

## Responses

**104-1**  
Comment noted.

**104-2**  
Comment noted.

**105-1**  
The Clorox property would be affected by all routes except the Existing Corridor, Foothills, and Southern Alternatives. Under the Preferred, Proposed, and Northern Alternatives, the transmission line would run across Moya Boulevard. from the Clorox property. The final route alignment will be determined after the publication of the Final EIS and identified in the ROD. At that time, exact routing details will be available.

**106-1**  
Comment noted.

## Comments

## Responses

Letter  
107



"Guy Quiggle"  
<quiggs@worldnet.att.net>

To: <tracysilverlake\_eis@blm.gov>  
cc:  
Subject: Tracy-Spanish Springs-Stead, powerline route.

11/18/2003 09:13 PM

As a Spanish Springs resident, (Owner of property at NW end of the Valley in Bridle Path Subdivision) I am greatly concerned about the proposed Tracy to Stead powerline route. The routes as presented in the RGJ Sparks edition, are six in number and are represented by different colors, with dark blue being the preferred route. Well I also prefer this route if it could be buried along La Posada to the Sugar Loaf Substation. The light blue route along Calle de La Platta, and the pink route going farther North, I strongly oppose due to the proximity of the light blue route to my own home as well as all my other neighbors on the North end of Bridle Path. We would be greatly concerned for the safety of our two young children as well as many many others living in this area, with high power lines running through their playing and recreation areas. Where the light blue route is proposed is near the bridle trails and common areas and is really an uncluttered view. Please do not ruin what we have invested in our property for the last ten years, or the reason we moved out here to raise our kids, which is wide open spaces and clear vistas. Thank You.

Guy L. Quiggle  
20 Moonbeam Ct  
Sparks, Nv 89436  
424-2003

107-1

Comment noted.

107-2

Comment noted.

Letter  
108



csavely@lionelsawyer.com

To: tracysilverlake\_eis@blm.gov  
cc:  
Subject: Tracy-Silver Lake Transmission Line Project EIS

10/06/2003 10:31 AM

Terri Knutson, Planner:

I reside at 305 Alamosa Drive, which is located at the northern end of Spanish Springs Valley.

I have reviewed the draft EIS and offer the following comments.

I strongly support the preferred alternative. As presented, this route provides the superior alternative for minimizing all environmental impacts, especially to areas of new disturbances while also minimizing financial impacts to SPPC's customers which is also an important consideration.

The northern alternative would seem to produce the most disturbance both during construction and long term, and because of the additional equipment installed would likely result in higher maintenance costs (for no good reason) long term causing an unnecessary adverse impact on SPPC's customers future electric bills.


Carl D. Savely  
305 Alamosa Dr.  
Sparks, Nevada 89436

108-1

Comment noted.

## Comments

## Responses

**Letter**  **109**

"bobtrimmer"  
<bobtrimmer@sbcglobal.net>  
12/11/2003 07:21 PM

To: <tracysilverlake\_eis@blm.gov>  
cc:  
Subject: Public Comments on the EIS

To Whom It May Concern:

In response to your request for comment from the public concerning the proposed Tracy to Silver Lake Transmission Project, I would appreciate your attention to my following observations. I am particularly disappointed that the utility company is not required to bury all new power lines. It is of course much more expensive but the aesthetic and safety benefits are, in my mind, justified. <?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />

Within the last year, I as well as many others, built and now occupy a new home within proximity of the proposed "Foothills Alternative." One of the desirable features of building a new home in the Foothills Subdivision was the view of the Pah Rah Range. The Foothills Alternative will be constructed immediately east of my subdivision, and north along La Pasada. Since the utility poles will be a height of 65 to 90 feet, they will probably be visible from my new home, thus diminishing the view, which others and I felt was so attractive. If the poles are similar to the high voltage poles which cross Sparks Blvd. and Satellite Dr. intersection, they are very large. I believe the diameter is approximately 36" at the base. These poles are very visible and unsightly. No matter what efforts the utility company tries to mitigate their visibility, they cannot reduce their unsightliness. Not only will this proposed alternative diminish the view but ultimately the value of my new home.

The BLM Draft EIS indicates that the "Foothills Alternative" will impact more existing structures within 150 of the transmission line than ALL other alternatives. Even though the Proposed Action will require "mitigation "(options include constructing the transmission line underground, designing low EMF lines, designing low-visibility lines, or conducting off-site mitigation), or purchase at fair market value the structures within the 150 foot boundary," the impact of the Foothills Alternative is dramatic. Huge utility poles and the required safety markings of the transmission lines with orange balls, where necessary, will severely diminish the neighborhood.

Of all the alternatives, the "Foothills Alternative" affects more existing structures than any other alternative (as indicated in the BLM EIS). I am sure that most residents within or in close proximity to, the proposed alternatives do not want their neighborhood diminished by the project. To lessen the impact of this project it seems only reasonable to choose an alternative with the least impact. The BLM EIS itself indicates that the "Foothills Alternative" will have the greatest impact.

Please consider requiring the utility company to bury the power lines or select the alternative that least affects the surrounding area.

Robert W. Trimmer  
4201 Desert Fox Drive  
Sparks, NV 89436  
775-424-2611

RobR

### 109-1

The poles and lines that cross the Sparks Boulevard and Satellite Drive intersection are double circuited 345/120 KV lines. The only alternative that would include poles and lines similar to these would be along the Existing Corridor Alternative. All of the other alternatives would contain poles and lines as depicted in the KOP simulations in Appendix F.

### 109-2

Comment noted.



## Comments

## Responses

Letter  
110



"Rich Wilder"  
<r-wilder@charter.net>

10/29/2003 07:32 PM

To: <tracysilverlake\_eis@blm.gov>  
cc: "Rich Wilder" <r-wilder@charter.net>  
Subject: Tracy-Silver Lake Transmission Lin Project

October 29, 2003

Dear Ms. Knutson,

I respectfully submit the following comments in regards to the "Draft Tracy-Silver Lake Transmission Line Project EIS Summary" dated September 2003.

I strongly suggest adopting the Calle de la Plata Alternative or the Existing Corridor Alternative for the following reasons.

- 110-1 | 1) The Calle de la Plata Alternative would produce the least Land Use impact of all the actions affecting only 2 qualifying structures as opposed to 12 qualifying structures for the Proposed Action.
- 110-2 | 2) The Existing Corridor Alternative would produce the least visual impacts because it would be built by replacing existing transmission line segments.

Thank you.  
Sincerely,

Richard Wilder  
8960 Jedediah Smith Drive  
Sparks, NV 89436  
775-425-6459

110-1  
Comment noted

110-2  
Comment noted

## Comments

Letter  
111



"mitch ziegler"  
<mitchziegler@msn.co  
m>

11/17/2003 07:45 AM

To: <tracysilverlake\_eis@blm.gov>  
cc:  
Subject: transmission line project

<?xml:namespace prefix="v" /><?xml:namespace prefix="o" />

Attention: BLM Carson City Field Office  
Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
FAX: (775) 885-6147

- 111-1** I own and reside in parcel # 076-310-53 in Spanish Springs Ranches development. I have several major issues regarding the plan to using the "existing" line route identified as "alternative route ( incorporating existing line)" as identified on "Recreation and Special Management Areas" Tracy to Silver Lake 120 KV Transmission Line FIGURE 3-9.
- 111-2** First, my 40 acre parcel is covered with sage brush and other dry vegetation. In the event of a downed power line there would be a fire that would spread so rapidly my house and livestock would be destroyed. This would occur because the lack of electrical power would also shut down my well pump making water non-existent to fight the resulting power line fire. My house is only a couple hundred feet from the Sierra Pacific right of way which means that fire trucks would not be able to reach the fire in time to save my house and live stock. Not only that, but the probability of my family's survival during such an event is unlikely.  
Please use the following link [www.nebraskacattlemen.org/newsletter/nslt31999.htm](http://www.nebraskacattlemen.org/newsletter/nslt31999.htm) "FIRE SCORCHES SANDHILLS"  
In this event a downed power line flamed across 80,000 acres killing 500 - 1000 head of cattle as well as numerous buildings and homes.  
Also please review [www.kltz.com/archives/newsaug00.html](http://www.kltz.com/archives/newsaug00.html) "LATEST ON AREA FIRES"  
In this event a downed power line caused a grass fire that threatened various buildings and homes.
- 111-3** Secondly, much of my property consists of iron impregnated rock. In the event of a downed power line during a wet period the downed power line will transmit power across the ground and electrocute my live stock as well as endanger my family. Bear in mind that my house is located only a couple hundred feet from the Sierra Pacific right of way.  
Please see the following link [www.emergencyhandbook.com/downed\\_electrical\\_line.shtml](http://www.emergencyhandbook.com/downed_electrical_line.shtml)  
See "ELECTROCUTION THROUGH THE GROUND"  
This states that the DANGER ZONE around an electrical hazard is "1500 feet in diameter- the length of 5 football fields". My house, livestock and most important my family all lie well

## Responses

**111-1**  
Comment noted.

**111-2**  
Comment noted.

**111-3**  
Comment noted.

## Comments

WITHIN the DANGER ZONE.

**111-4** | Thirdly, the esthetic view of the mountains and city would be severely compromised lowering property values and personal satisfaction. The existing power lines are bad enough to see as well as dangerous enough for safety of my live stock and family.

**111-5** | Lastly, the power lines effectively divide my parcel making the lower 2/3 of my parcel unable to be secured. Fencing and grazing the entire parcel is impossible because of the Sierra Pacific right of way.

It should be noted that I am highly motivated and financially secure enough to do what is necessary to prevent the proposed 120 KV power lines from crossing my property. I may not fully understand what Sierra Pacific's rights may be but the realistic impact of people's deaths and property damage must be dealt with privately or publicly or in the courts of the government or the court of public opinion, which ever prevents this impending travesty.

Please feel free to e-mail any response, Fax at the number below or use the mailing address below.

Mitch Ziegler  
2875 F Northtowne Lane #216  
Reno, NV 89512

FAX (413)294-6383

**Letter  
112**



"Linda Shepard"  
<ShepardL@ci.reno.nv.us>

To: <tracysilverlake\_eis@blm.gov>  
cc:  
Subject: Response to EIS

01/20/2004 02:50 PM

**112-1** | Terry,  
We are opposed to above ground development. We don't want taller poles in front of our house or in the open spaces of Hungry Valley. We would appreciate any efforts to encourage underground developement like they did on the pipeline.

**112-2** | If there are going to be power poles, we are opposed to any route within eyesight of our home. We are not in the same situation as those living in housing developments. The beauty of our home is the scenery.

Thank you,  
Linda Cunrod  
701 Hungry Valley Road  
775 972-6399

## Responses

**111-4**  
Comment noted.

**111-5**  
Comment noted.

**112-1**  
Comment noted.

**112-2**  
Comment noted.

## Comments

## Responses

**Letter 113** To: BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
December 13, 2003

**Ref:** Tracy to Silver Lake Transmission Project

**Re:** La Posada Utility Corridor and Pyramid Highway

Dear Ms. Knutson,

As a property owner in the Spanish Springs area, I object to the aerial routing of the power lines.

**113-1** The overhead routing is a visual blight, as shown in your photographic presentations of the area of La Posada near Cordoba Blvd. This exact area is part of my daily commute and is the way I give directions to guests visiting our home. The existing poles and lines are “industrial” looking as is and I would hate to see more lines and taller poles!!

**113-2** The base of the 65’ tall poles would be near enough to some buildings adjacent to La Posada, and I think this could present an issue of public safety. I understand that good design criteria recommends 150’ separation from structures.

**113-3** The City of Sparks requires all new distribution lines to be underground within the city limits, and “prefers” the same for transmission lines...why not start here?

There will never be a better time to put the lines underground than now, before future development provides more roads that would need to be cut across.

**113-4** Overhead routing would likely lead to future “additions”, once the “utility corridor” is established. What the heck, how much more unsightly are 11 lines than 7. This is obviously the current thinking, with the 3 lines and 45’ poles we have now! The cable TV company certainly thinks this way, as they added their thick line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

**113-5** In conclusion, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada and up Pyramid Highway, or using the alternative Calle de Plata routing.

Sincerely,

David Schulte  
55 Desert Dude Ct.  
Sparks, NV 89436

**113-1**  
Comment noted.

**113-2**  
Comment noted.

**113-3**  
Comment noted.

**113-4**  
Comment noted.

**113-5**  
Comment noted.

## Comments

## Responses

**Letter  
114**

To: BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

December 14, 2003

Ref: Tracy to Silver Lake Transmission Project

Re: La Posada Utility Corridor and Pyramid Highway

Dear Ms. Knutson,

As a property owner in the Spanish Springs area, I object to the aerial routing of the power lines.

**114-1**

The overhead routing is a visual blight, as shown in your photographic presentations of the area of La Posada near Cordoba Blvd. The existing poles and lines are "industrial" looking as is and I would hate to see more lines and taller poles!!

**114-2**

The base of the 65' tall poles would be near enough to some buildings adjacent to La Posada, and I think this could present an issue of public safety. I understand that good design criteria recommends 150' separation from structures.

**114-3**

The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?

There will never be a better time to put the lines underground than now, before future development provides more roads that would need to be cut across.

**114-4**

Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much more unsightly are 11 lines than 7. This is obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

**114-5**

In conclusion, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada and up Pyramid Highway, or using the alternative Calle de Plata routing.

Sincerely,



Carrie Stropp  
963 Yellowhammer Dr.  
Sparks, NV 89436

**114-1**

Refer to response 111-1.

**114-2**

Refer to response 111-2.

**114-3**

Refer to response 111-3.

**114-4**

Refer to response 111-4.

**114-5**

Refer to response 111-5.

## Comments

## Responses

**Letter 115** To: BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

December 14, 2003

**Ref:** Tracy to Silver Lake Transmission Project

**Re:** La Posada Utility Corridor and Pyramid Highway

Dear Ms. Knutson,

As a property owner in the Spanish Springs area, I object to the aerial routing of the power lines.

**115-1** The overhead routing is a visual blight, as shown in your photographic presentations of the area of La Posada near Cordoba Blvd. The existing poles and lines are "industrial" looking as is and I would hate to see more lines and taller poles!!

**115-2** The base of the 65' tall poles would be near enough to some buildings adjacent to La Posada, and I think this could present an issue of public safety. I understand that good design criteria recommends 150' separation from structures.

**115-3** The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?

There will never be a better time to put the lines underground than now, before future development provides more roads that would need to be cut across.

**115-4** Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much more unsightly are 11 lines than 7. This is obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

**115-5** In conclusion, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada and up Pyramid Highway, or using the alternative Calle de Plata routing.

Sincerely,

*Mark A. Knutson*

5665 Morgan Mill Rd  
Carson City, NV 89701

**115-1**  
Refer to response 111-1

**115-2**  
Refer to response 111-2.

**115-3**  
Refer to response 111-3.

**115-4**  
Refer to response 111-4.

**115-5**  
Refer to response 111-5.

## Comments

## Responses

### Letter 116

To: BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

December 14, 2003

Ref: Tracy to Silver Lake Transmission Project

Re: La Posada Utility Corridor and Pyramid Highway

Dear Ms. Knutson,

As a property owner in the Spanish Springs area, I object to the aerial routing of the power lines.

**116-1** | The overhead routing is a visual blight, as shown in your photographic presentations of the area of La Posada near Cordoba Blvd. The existing poles and lines are "industrial" looking as is and I would hate to see more lines and taller poles!!

**116-2** | The base of the 65' tall poles would be near enough to some buildings adjacent to La Posada, and I think this could present an issue of public safety. I understand that good design criteria recommends 150' separation from structures.

**116-3** | The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?

There will never be a better time to put the lines underground than now, before future development provides more roads that would need to be cut across.

**116-4** | Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much more unsightly are 11 lines than 7. This is obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

**116-5** | In conclusion, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada and up Pyramid Highway, or using the alternative Calle de Plata routing.

Sincerely,

*Robert Doll*  
7865 Las Plumas Dr.  
Sparks, NV 89436  
775 424-2552

### 116-1

Refer to response 111-1.

### 116-2

Refer to response 111-2.

### 116-3

Refer to response 111-3.

### 116-4

Refer to response 111-4.

### 116-5

Refer to response 111-5.

## Comments

## Responses

### Letter

117

To: BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

December 14, 2003

Ref: Tracy to Silver Lake Transmission Project

Re: La Posada Utility Corridor and Pyramid Highway

Dear Ms. Knutson,

As a property owner in the Spanish Springs area, I object to the aerial routing of the power lines.

117-1

The overhead routing is a visual blight, as shown in your photographic presentations of the area of La Posada near Cordoba Blvd. The existing poles and lines are "industrial" looking as is and I would hate to see more lines and taller poles!!

117-1

Refer to response 111-1.

117-2

The base of the 65' tall poles would be near enough to some buildings adjacent to La Posada, and I think this could present an issue of public safety. I understand that good design criteria recommends 150' separation from structures.

117-2

Refer to response 111-2.

117-3

The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?

117-3

Refer to response 111-3.

There will never be a better time to put the lines underground than now, before future development provides more roads that would need to be cut across.

117-4

Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much more unsightly are 11 lines than 7. This is obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

117-4

Refer to response 111-4.

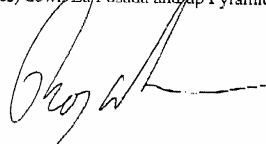
117-5

In conclusion, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada and up Pyramid Highway, or using the alternative Calle de Plata routing.

117-5

Refer to response 111-5.

Sincerely,



Ron Akers  
963 Yellowhammer Dr.  
Sparks, NV 89436



## Comments

## Responses

### Letter

**118** To: BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
December 14, 2003

**Ref:** Tracy to Silver Lake Transmission Project

**Re:** La Posada Utility Corridor and Pyramid Highway

Dear Ms. Knutson,

As a property owner in the Spanish Springs area, I object to the aerial routing of the power lines.

**118-1** The overhead routing is a visual blight, as shown in your photographic presentations of the area of La Posada near Cordoba Blvd. The existing poles and lines are "industrial" looking as is and I would hate to see more lines and taller poles!!

**118-2** The base of the 65' tall poles would be near enough to some buildings adjacent to La Posada, and I think this could present an issue of public safety. I understand that good design criteria recommends 150' separation from structures.

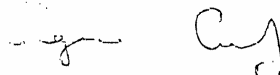
**118-3** The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?

There will never be a better time to put the lines underground than now, before future development provides more roads that would need to be cut across.

**118-4** Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much more unsightly are 11 lines than 7. This is obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

**118-5** In conclusion, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada and up Pyramid Highway, or using the alternative Calle de Plata routing.

Sincerely,

  
3000 Virginia  
Sparks NV 89436

**118-1**

Refer to response 111-1.

**118-2**

Refer to response 111-2.

**118-3**

Refer to response 111-3.

**118-4**

Refer to response 111-4.

**118-5**

Refer to response 111-5.

## Comments

## Responses

### Letter

**119** To: BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701  
December 14, 2003

Ref: Tracy to Silver Lake Transmission Project

Re: La Posada Utility Corridor and Pyramid Highway

Dear Ms. Knutson,

As a property owner in the Spanish Springs area, I object to the aerial routing of the power lines.

**119-1** The overhead routing is a visual blight, as shown in your photographic presentations of the area of La Posada near Cordoba Blvd. The existing poles and lines are "industrial" looking as is and I would hate to see more lines and taller poles!!

**119-2** The base of the 65' tall poles would be near enough to some buildings adjacent to La Posada, and I think this could present an issue of public safety. I understand that good design criteria recommends 150' separation from structures.

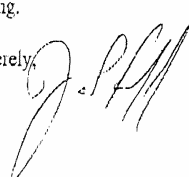
**119-3** The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?

There will never be a better time to put the lines underground than now, before future development provides more roads that would need to be cut across.

**119-4** Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much more unsightly are 11 lines than 7. This is obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

**119-5** In conclusion, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada and up Pyramid Highway, or using the alternative Calle de Plata routing.

Sincerely,

 100 KARNAIC CR.  
SPARKS NV 89436

**119-1**  
Refer to response 111-1.

**119-2**  
Refer to response 111-2.

**119-3**  
Refer to response 111-3.

**119-4**  
Refer to response 111-4.

**119-5**  
Refer to response 111-5.

## Comments

## Responses

**Letter 120** To: BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

December 14, 2003

Ref: Tracy to Silver Lake Transmission Project

Re: La Posada Utility Corridor and Pyramid Highway

Dear Ms. Knutson,

As a property owner in the Spanish Springs area, I object to the aerial routing of the power lines.

**120-1** The overhead routing is a visual blight, as shown in your photographic presentations of the area of La Posada near Cordoba Blvd. The existing poles and lines are "industrial" looking as is and I would hate to see more lines and taller poles!!

**120-2** The base of the 65' tall poles would be near enough to some buildings adjacent to La Posada, and I think this could present an issue of public safety. I understand that good design criteria recommends 150' separation from structures.

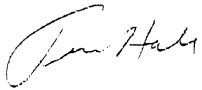
**120-3** The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?

There will never be a better time to put the lines underground than now, before future development provides more roads that would need to be cut across.

**120-4** Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much more unsightly are 11 lines than 7. This is obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

**120-5** In conclusion, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada and up Pyramid Highway, or using the alternative Calle de Plata routing.

Sincerely,



Terri Hale  
20 Lindberg Lane  
Sparks, NV 89436

**120-1**  
Refer to response 111-1.

**120-2**  
Refer to response 111-2.

**120-3**  
Refer to response 111-3.

**120-4**  
Refer to response 111-4.

**120-5**  
Refer to response 111-5.

## Comments

## Responses

**Letter To:** BLM Carson City Field Office  
**121** Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

**Ref:** Tracy to Silver Lake Transmission Project

**Re:** La Posada Utility Corridor and Pyramid Highway

Dear Ms. Knutson,

As a property owner in the Spanish Springs area, I object to the aerial routing of the power lines.

**121-1** | The overhead routing is a visual blight, as shown in your photographic presentations of the area of La Posada near Cordoba Blvd. This exact area is part of my daily commute and is the way I give directions to guests visiting our home. The existing poles and lines are “industrial” looking as is and I would hate to see more lines and taller poles!!

**121-2** | The base of the 65’ tall poles would be near enough to some buildings adjacent to La Posada, and I think this could present an issue of public safety. I understand that good design criteria recommends 150’ separation from structures.

**121-3** | The City of Sparks requires all new distribution lines to be underground within the city limits, and “prefers” the same for transmission lines...why not start here?

There will never be a better time to put the lines underground than now, before future development provides more roads that would need to be cut across.

**121-4** | Overhead routing would likely lead to future “additions”, once the “utility corridor” is established. What the heck, how much more unsightly are 11 lines than 7. This is obviously the current thinking, with the 3 lines and 45’ poles we have now! The cable TV company certainly thinks this way, as they added their thick line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

**121-5** | In conclusion, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada and up Pyramid Highway, or using the alternative Calle de Plata routing.

Sincerely,

Theresa Schulte  
55 Desert Dude Ct.  
Sparks, NV 89436

**121-1**  
Refer to response 111-1.

**121-2**  
Refer to response 111-2.

**121-3**  
Refer to response 111-3.

**121-4**  
Refer to response 111-4.

**121-5**  
Refer to response 111-5.

## Comments

## Responses

**Letter  
122**

**To:** BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

December 14, 2003

**Ref:** Tracy to Silver Lake Transmission Project

**Re:** La Posada Utility Corridor and Pyramid Highway

Dear Ms. Knutson,

As a property owner in the Spanish Springs area, I object to the aerial routing of the power lines.

**122-1**

The overhead routing is a visual blight, as shown in your photographic presentations of the area of La Posada near Cordoba Blvd. The existing poles and lines are "industrial" looking as is and I would hate to see more lines and taller poles!!

**122-2**

The base of the 65' tall poles would be near enough to some buildings adjacent to La Posada, and I think this could present an issue of public safety. I understand that good design criteria recommends 150' separation from structures.

**122-3**

The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?

There will never be a better time to put the lines underground than now, before future development provides more roads that would need to be cut across.

**122-4**

Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much more unsightly are 11 lines than 7. This is obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

**122-5**

In conclusion, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada and up Pyramid Highway, or using the alternative Calle de Plata routing.

Sincerely,

*Leresa J. Dauch*  
9110 Cordoba Blvd.  
Sparks, NV 89436  
(775) 425-3429

**122-1**

Refer to response 111-1.

**122-2**

Refer to response 111-2.

**122-3**

Refer to response 111-3.

**122-4**

Refer to response 111-4.

**122-5**

Refer to response 111-5.

## Comments

## Responses

**Letter  
123**

Denis Van Gundy  
8075 Caceres Court  
Sparks, NV 89436-6248

**To:** BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

**Ref:** Tracy to Silver Lake Transmission Project

**Re:** La Posada Utility Corridor

Dear Ms. Knutson,

As a property owner bordering La Posada Road on the south, nearest the existing distribution and the proposed transmission pole line, I object only to the aerial routing of the power lines. My reasons are as follow:

- 123-1** | 1. Overhead routing is a visual blight, especially as near to my property as the power lines would be. They would be an un-avoidable part of my view, impossible to minimize with tree planting.
  - 123-2** | 2. The base of the 65' tall poles would be 50' away from my permitted shop/garage structure, with my office on the side nearest the road. Power lines and poles have been known to break and fall on structures, thus design criteria recommends 150' separation from structures.
  - 123-3** | 3. The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?
  - 123-4** | 4. There will never be a better time to put the lines underground than now, before future development requires it and more roads need to be cut across.
  - 123-5** | 5. Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much uglier are 11 lines than 7...obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick, galloping line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).
  - 123-6** | 6. EMF – our next "Love Canal", PCB or asbestos issue?
- In closing, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada, or using the alternative Calle de Plata routing.

Thank you for your consideration.

Sincerely,

Denis Van Gundy

**123-1**

Refer to response 111-1.

**123-2**

Refer to response 111-2.

**123-3**

Refer to response 111-3.

**123-4**

Refer to response 111-4.

**123-5**

Comment noted.

**123-6**

Refer to response 111-5.

## Comments

## Responses

Letter  
124

Beverley Van Gundy  
8075 Caceres Court  
Sparks, NV 89436-6248

To: BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

Ref: Tracy to Silver Lake Transmission Project

Re: La Posada Utility Corridor

Dear Ms. Knutson,

As a property owner bordering La Posada Road on the south, nearest the existing distribution and the proposed transmission pole line, I object only to the aerial routing of the power lines. My reasons are as follow:

- 124-1 | 1. Overhead routing is a visual blight, especially as near to my property as the power lines would be. They would be an un-avoidable part of my view, impossible to minimize with tree planting.
- 124-2 | 2. The base of the 65' tall poles would be 50' away from our permitted shop/garage structure, with my husband's office on the side nearest the road. Power lines and poles have been known to break and fall on structures, thus design criteria recommends 150' separation from structures.
- 124-3 | 3. The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?
- 124-4 | 4. There will never be a better time to put the lines underground than now, before future development requires it and more roads need to be cut across.
- 124-4 | 5. Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much more unsightly are 11 lines than 7. This is obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick, galloping line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

- 124-5 | In closing, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada, or using the alternative Calle de Plata routing.

Sincerely,

Beverley Van Gundy

124-1  
Refer to response 111-1.

124-2  
Refer to response 111-2.

124-3  
Refer to response 111-3.

124-4  
Refer to response 111-4.

124-5  
Refer to response 111-5.

## Comments

## Responses

Letter  
125

Dan Blake  
8080 Caceres Court  
Sparks, NV 89436

To: BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

Ref: Tracy to Silver Lake Transmission Project

Re: La Posada Utility Corridor

Dear Ms. Knutson,

I am a property owner bordering La Posada Road on the south, nearest the existing distribution and the proposed transmission pole line. I object to the aerial routing of the power lines. My reasons are as follow:

- 125-1 | § Overhead routing is a visual blight, especially as near to my property as the power lines would be. The existing power, phone and cable lines currently dominate my backyard view. We are planning a pool in the rear corner (northeast) nearest to the pole line. My 2 children play in the backyard now and in the pool in the future. We couldn't possibly block the view with tree planting.
- 125-2 | § The tops of the 65' tall poles (where the 120kv lines are would be able to fall within my backyard and possibly into the future pool, endangering my children and property. Power lines and poles have been known to break and fall, thus design criteria recommends 150' separation from structures.
- 125-3 | § The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?
- § There will never be a better time to put the lines underground than now, before future development requires it and more roads need to be cut across.
- 125-4 | § Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much uglier are 11 lines than 7...obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick, galloping line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).
- 125-5 | § EMF – an unknown danger to my children, either playing in their backyard, pool or even in their bedrooms at night.
- 125-6 | In closing, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada, or using the alternative Calle de Plata routing.

Thank you for your consideration.

Sincerely,



Dan Blake

125-1

Refer to response 111-1.

125-2

Refer to response 111-2.

125-3

Refer to response 111-3.

125-4

Refer to response 111-4.

125-5

Comment noted.

125-6

Refer to response 111-5.



## Comments

## Responses

Letter  
126

Joanne Blake  
8080 Caceres Court  
Sparks, NV 89436

To: BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

Ref: Tracy to Silver Lake Transmission Project

Re: La Posada Utility Corridor


Dear Ms. Knutson,

I am a property owner bordering La Posada Road on the south, nearest the existing distribution and the proposed transmission pole line. I object to the aerial routing of the power lines. My reasons are as follow:

- 126-1 | 1. Overhead routing is a visual blight, especially as near to my property as the power lines would be. My backyard view is dominated by the existing power, phone and cable lines, and we are planning a pool in the rear corner (northeast) nearest to the pole line. My 2 children play in the backyard now and in the pool in the future. We couldn't possibly block the view with tree planting.
  - 126-2 | 2. The tops of the 65' tall poles (where the 120kv lines are would be able to fall within my backyard and possibly into the future pool, endangering my children and property. Power lines and poles have been known to break and fall, thus design criteria recommends 150' separation from structures.
  - 126-3 | 3. The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?
  - 126-4 | 4. There will never be a better time to put the lines underground than now, before future development requires it and more roads need to be cut across.
  - 126-5 | 5. Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much uglier are 11 lines than 7...obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick, galloping line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).
  - 126-6 | 6. EMF – an unknown danger to my children, either playing in their backyard, pool or even in their bedrooms at night.
- In closing, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada, or using the alternative Calle de Plata routing.

Thank you for your consideration.

Sincerely,

  
Joanne Blake

126-1

Refer to response 111-1.

126-2

Refer to response 111-2.

126-3

Refer to response 111-3.

126-4

Refer to response 111-4.

126-5

Comment noted.

126-6

Refer to response 111-5.

## Comments

## Responses

**Letter  
127**

**To:** BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

**Ref:** Tracy to Silver Lake Transmission Project

**Re:** La Posada Utility Corridor

Dear Ms. Knutson,

I am a property owner bordering La Posada Road on the North, at the corner of La Posada and Rayo Del Sol, near the existing distribution and the proposed transmission pole line. I object to the aerial routing of the power lines. My reasons are as follow:

- 127-1** | 1. Overhead routing is a visual blight, especially as near to my property as the taller transmission power lines would be. My valley view is dominated by the existing power, phone and cable lines, which I can look over, but another 20 or so feet higher with 4 lines at the top would have a serious effect on the quality of my view and my property value. I couldn't block the view with tree planting in my lifetime.
- 127-2** | 2. The tops of the 65' tall poles (where the 120kv lines are) would be able to fall within my property, endangering my 2 sons, who play "Army" on our land.
- 127-3** | 3. The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?
4. There will never be a better time to put the lines underground than now, before future development requires it and more roads need to be cut across.
- 127-4** | 5. Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much uglier are 11 lines than 7...obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick, galloping line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).
- 127-5** | In closing, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada, or using the alternative Calle de Plata routing.

Thank you for your consideration.

Sincerely,

Marybeth Akers  
15 Rayo Del Sol  
Sparks, NV 89436

**127-1**  
Refer to response 111-1.

**127-2**  
Refer to response 111-2.

**127-3**  
Refer to response 111-3.

**127-4**  
Refer to response 111-4.

**127-5**  
Refer to response 111-5.

## Comments

## Responses

**Letter 128**  
**To:** BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

**Ref:** Tracy to Silver Lake Transmission Project

**Re:** La Posada Utility Corridor

Dear Ms. Knutson,

I am a property owner bordering La Posada Road on the North, at the corner of La Posada and Rayo Del Sol, near the existing distribution and the proposed transmission pole line. I object to the aerial routing of the power lines. My reasons are as follow:

**128-1** | 1. Overhead routing is a visual blight, especially as near to my property as the taller transmission power lines would be. My valley view is dominated by the existing power, phone and cable lines, which I can look over, but another 20 or so feet higher with 4 lines at the top would have a serious effect on the quality of my view and my property value. I couldn't block the view with tree planting in my lifetime.

**128-2** | 2. The tops of the 65' tall poles (where the 120kv lines are) would be able to fall within my property, endangering my 2 sons, who play "Army" on our land.

**128-3** | 3. The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?

4. There will never be a better time to put the lines underground than now, before future development requires it and more roads need to be cut across.

**128-4** | 5. Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much uglier are 11 lines than 7...obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick, galloping line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

**128-5** | In closing, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada, or using the alternative Calle de Plata routing.

Thank you for your consideration.

Sincerely,

James Akers  
15 Rayo Del Sol  
Sparks, NV 89436

**128-1**  
Refer to response 111-1.

**128-2**  
Refer to response 111-2.

**128-3**  
Refer to response 111-3.

**128-4**  
Refer to response 111-4.

**128-5**  
Refer to response 111-5.

## Comments

## Responses

**Letter  
129**

To: BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

December 15, 2003

Ref: Tracy to Silver Lake Transmission Project

Re: La Posada Utility Corridor

Dear Ms. Knutson,

I am a property owner bordering La Posada Road on the south, nearest the existing distribution and the proposed transmission pole line. I object to the aerial routing of the power lines. My reasons are as follow:

129-1 | § Overhead routing is a visual blight, especially as near to my property as the power lines would be. My children play in the backyards of the 2 neighbors nearer to the pole line and in the pool in my next-door neighbor's backyard.

129-2 | § The tops of the 65' tall poles (where the 120kv lines are) would be able to fall within my further neighbor's backyard and possibly into their future pool, endangering my children when they play with the neighbor's kids. Power lines and poles have been known to break and fall, thus design criteria recommends 150' separation from structures.

129-3 | § The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?  
§ There will never be a better time to put the lines underground than now, before future development requires it and more roads need to be cut across.

129-4 | § Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much uglier are 11 lines than 7...obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick, galloping line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

129-5 | In closing, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada, or using the alternative Calle de Plata routing.

Thank you for your consideration.

Sincerely,



Tammy Yau  
8060 Caceres Court  
Sparks, NV 89436

**129-1**

Refer to response 111-1.

**129-2**

Refer to response 111-2.

**129-3**

Refer to response 111-3.

**129-4**

Refer to response 111-4.

**129-5**

Refer to response 111-5.

## Comments

## Responses

**Letter  
130**

To: BLM Carson City Field Office  
Attn: Terri Knutson  
5665 Morgan Mill Road  
Carson City, NV 89701

December 15, 2003

Ref: Tracy to Silver Lake Transmission Project

Re: La Posada Utility Corridor

Dear Ms. Knutson,

I am a property owner bordering La Posada Road on the south, nearest the existing distribution and the proposed transmission pole line. I object to the aerial routing of the power lines. My reasons are as follow:

**130-1**

§ Overhead routing is a visual blight, especially as near to my property as the power lines would be. My children play in the backyards of the 2 neighbors nearer to the pole line and in the pool in my next-door neighbor's backyard.

**130-2**

§ The tops of the 65' tall poles (where the 120kv lines are) would be able to fall within my further neighbor's backyard and possibly into their future pool, endangering my children when they play with the neighbor's kids. Power lines and poles have been known to break and fall, thus design criteria recommends 150' separation from structures.

**130-3**

§ The City of Sparks requires all new distribution lines to be underground within the city limits, and "prefers" the same for transmission lines...why not start here?

§ There will never be a better time to put the lines underground than now, before future development requires it and more roads need to be cut across.

**130-4**

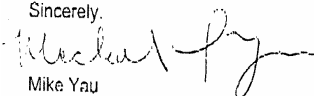
§ Overhead routing would likely lead to future "additions", once the "utility corridor" is established. What the heck, how much uglier are 11 lines than 7...obviously the current thinking, with the 3 lines and 45' poles we have now! The cable TV company certainly thinks this way, as they added their thick, galloping line lower on the existing poles (as I understand, without even getting approval from the power company, much less us local property owners and taxpayers).

**130-5**

In closing, I recommend burying the lines (including the existing distribution, phone and CATV lines) down La Posada, or using the alternative Calle de Plata routing.

Thank you for your consideration.

Sincerely,



Mike Yau  
8060 Caceres Court  
Sparks, NV 89436

**130-1**

Refer to response 111-1.

**130-2**

Refer to response 111-2.

**130-3**

Refer to response 111-3.

**130-4**

Refer to response 111-4.

**130-5**

Refer to response 111-5.